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**FINAL FINDING OF SUITABILITY TO TRANSFER (FOST) # 4 FOR CARVE-
OUTS I-B, I-E, I-G, I-H, I-I, I-J, I-L, I-M, I-P, II-G, II-I, II-P, AND III-D
(PUBLIC DOCUMENT)**

01/01/2009

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Final
Finding of Suitability to Transfer #4
for Carve-Outs I-B, I-E, I-G, I-H, I-I, I-J, I-L, I-M, I-P,
II-G, II-I, II-P, and III-D
Former Marine Corps Air Station
El Toro, California

January 2009

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1. Comments/Response to Comments
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3. Final RCRA Corrective Action Complete Determination Package
- 4a. Petroleum Products Notification Table
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ACRONYMS AND ABBREVIATIONS

ACM	asbestos-containing material
APHO	aerial photograph feature/anomaly
AST	aboveground storage tank
BRAC	Base Realignment and Closure
CCR	California Code of Regulations
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CO	carve-out
DERP	Defense Environmental Restoration Program
DoD	Department of Defense
DON	Department of the Navy
DTSC	Department of Toxic Substances Control
EBS	Environmental Baseline Survey
EPA	Environmental Protection Agency
FAD	friable, accessible, and damaged
FFA	Federal Facility Agreement
FOST	Finding of Suitability to Transfer
HSC	Health and Safety Code
IRP	Installation Restoration Program
LBP	lead-based paint
LOC	location of concern
MCAS	Marine Corps Air Station
NFA	no further action
OCHCA	Orange County Health Care Agency
OU	Operable Unit
OWS	oil/water separator
PCB	polychlorinated biphenyl
PCE	tetrachloroethylene
ppm	part per million
PRL	potential release location
RAD	radiological investigation location
RCRA	Resource Conservation and Recovery Act
RFA	RCRA Facility Assessment
ROD	Record of Decision
RWQCB	Regional Water Quality Control Board
SRU	silver recovery unit
SWMU	Solid Waste Management Unit
TAA	temporary accumulation area
TCE	trichloroethylene
TSCA	Toxic Substances Control Act
U.S.	United States
U.S.C.	United States Code
UST	underground storage tank
VOC	volatile organic compound

1. PURPOSE

The purpose of this Finding of Suitability to Transfer (FOST) is to summarize how the requirements and notifications for hazardous substances, petroleum products, and other regulated material within Carve-Outs I-B, I-E, I-G, I-H, I-I, I-J, I-L, I-M, I-P, II-G, II-I, II-P, and III-D at former Marine Corps Air Station (MCAS) El Toro have been satisfied by the United States (U.S.) Department of the Navy (DON). Through the Base Realignment and Closure (BRAC) process, the DON transferred, by deed, certain MCAS El Toro real property. Other real property known as Carve-Outs (COs) was retained by the DON, pending environmentally suitable to transfer status. This FOST was prepared in accordance with the Base Redevelopment and Realignment Manual (Department of Defense [DoD] 2006), and is consistent with the DoD Base Redevelopment and Implementation Manual (DoD 1997).

2. PROPERTY DESCRIPTION

Former MCAS El Toro is located in central Orange County, California (Figure 1) and was operationally closed in July 1999. The property proposed for transfer under this FOST consists of 13 COs comprising approximately 42.9 acres. Table 1 presents a summary of the buildings and structures within the CO areas. Figure 2 is a base-wide map that provides the location of the CO areas. A brief description of the CO areas is as follows:

- Carve-Out I-B (Figure 3) - consists of approximately 22.9 acres and is located in the western portion of the former base.
- Carve-Out I-E (Figure 4) - consists of approximately 0.9 acre and is located in the western portion of the former base.
- Carve-Out I-G (Figure 5) - consists of approximately 0.4 acre and is located in the western portion of the former base.
- Carve-Out I-H (Figure 6) - consists of approximately 0.8 acre and is located in the western portion of the former base.
- Carve-Out I-I (Figure 7) - consists of approximately 1.1 acres and is located in the western portion of the former base).
- Carve-Out I-J (Figure 8) - consists of approximately 0.7 acre and is located in the western portion of the former base.
- Carve-Out I-L (Figure 9) - consists of approximately 0.2 acre and is located in the western portion of the former base.
- Carve-Out I-M (Figure 10) - consists of approximately 1.0 acre and is located in the western portion of the former base.
- Carve-Out I-P (Figure 11) - consists of approximately 1.8 acres and is located in the northern portion of the former base.
- Carve-Out II-G (Figure 12) - consists of approximately 7.7 acres and is located in the eastern portion of the former base.
- Carve-Out II-I (Figure 13) - consists of approximately 0.4 acre and is located in the eastern portion of the former base.
- Carve-Out II-P (Figure 14) - consists of approximately 0.3 acre and is located in the eastern portion of the former base.

- Carve-Out III-D (Figure 15) - consists of approximately 4.7 acres and is located in the western portion of the former base.

3. REGULATORY COORDINATION

Former MCAS El Toro was listed on the U.S. Environmental Protection Agency (EPA) National Priorities List under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) in February 1990. The Defense Environmental Restoration Program (DERP), codified as 10 United States Code (U.S.C.) 2701–2709, gave the DoD Environmental Restoration Program a statutory basis. The DON implements the DERP subject to, and in a manner consistent with, CERCLA and its regulations.

In October 1990, U.S. EPA Region 9, State of California Department of Health Services (now referred to as California EPA/Department of Toxic Substances Control [DTSC]), Santa Ana RWQCB, and the DON signed a Federal Facility Agreement (FFA) (DON 1990). The U.S. EPA, DTSC, and Santa Ana RWQCB were notified of the initiation of this FOST and were issued copies for review. Regulatory agency comments to this FOST are provided in Attachment 1.

3.1 RESOURCE CONSERVATION AND RECOVERY ACT PART B PERMIT AND SUBTITLE C CORRECTIVE ACTION

This FOST reviews sites that were evaluated and addressed under DON's CERCLA and DERP authority as well as sites addressed under the corrective action requirements of the Resource Conservation and Recovery Act (RCRA) Subtitle C (for Solid Waste Management Units [SWMUs]), RCRA Subtitle I (for underground storage tanks [USTs]), and associated state laws and regulations administered by the U.S. EPA, the State of California, and the County of Orange. These corrective action authorities are similar to CERCLA in that they require response/corrective action (cleanup) where necessary in order to ensure adequate protection of human health and the environment - see Section 121(d) of CERCLA, Health and Safety Code (HSC) Section 25296.10(b), Title 23 California Code of Regulations (CCR) Sections 2720 (definition of "corrective action") and 2725(c), and Title 22 CCR Section 66264.101(a).

A decision that no action is required in order to protect human health and the environment, made by DON or an environmental regulator under those laws and regulations, also supports a DON determination under Section 120(h) of CERCLA that all remedial action necessary to protect human health and the environment with respect to any such substance remaining on the property has been taken and a determination that all necessary RCRA Subtitle C corrective action has been completed.

Former MCAS El Toro was subject to a RCRA Part B permit that was issued in June 1993 and expired on 18 August 2003. The permit addressed one regulated unit (Building 673-T3) as well as RCRA corrective action requirements for SWMUs. The RCRA permit incorporated the FFA for MCAS El Toro by reference and provided, in relevant part: "The activities required by the Agreement are intended to satisfy the corrective action requirements of RCRA Section 3004(u) and (v), and 42 U.S.C. Section 6924(u) and (v). The Agreement and any schedules contained therein are hereby incorporated by reference as the schedule for completing corrective action at the facility..." (Subsection V.A.1 of the permit). The FFA itself specifically requires that RCRA corrective action requirements be addressed in the FFA process - see subsections 1.1(b), 1.2(e), 3.1, 17.1, 17.2, 17.3, and 19 of the FFA (DON 1990).

The rationale for integrating CERCLA and RCRA corrective action requirements in this fashion is straightforward. The cleanup standard for CERCLA is set forth in Section 121 of CERCLA (CLEANUP STANDARDS), which states in the relevant part of Subsection 121(b)(1): "...The President shall select a remedial action that is protective of human health and the environment..." (42 U.S.C. Section 9621(b)(1)). The cleanup standard for RCRA Subtitle C corrective action in the State of California, is set forth in Title 22 CCR Section 66264.101(a) and provides, "The owner or operator of a facility seeking a permit for the transfer, treatment, storage, or disposal of hazardous waste shall institute corrective action as necessary to protect human health and the environment for all releases of hazardous waste or constituents from any solid or hazardous waste management unit at the facility, regardless of the time at which waste was placed in such unit." See also HSC Sections 25187 and 25200.10(b).

In a letter dated 8 March 1996, DTSC concurred with no further action (NFA) for Building 673-T3 and stated that the permit was terminated based on the closure certification report that was submitted by DON (DTSC 1996). DON continues to complete all RCRA Part B permit corrective actions for the SWMUs under the 1990 executed FFA.

DTSC proposed a RCRA Corrective Action Complete Determination for ten of the COs (I-E, I-G, I-H, I-I, I-J, I-P, II-G, II-I, II-P, and III-D), approximately 18.8 acres, as well as a Notice of Exemption pursuant to the California Environmental Quality Act. Two of the remaining COs (I-B and I-M), approximately 23.9 acres, have on-going corrective action for petroleum releases and require additional documentation in order to satisfy the corrective action requirements under RCRA. Both COs I-B and I-M are proposed for transfer with restrictions as discussed in Section 5.0. CO I-L, approximately 0.2 acres, received NFA during the recent public comment period but is not included in DTSC's RCRA Corrective Action Complete Determination. Although DON will pursue the RCRA Corrective Action Complete Determination at a later time, CO I-L is now proposed for transfer without restrictions (see Attachment 2).

3.2 RESOURCE CONSERVATION AND RECOVERY ACT SUBTITLE I CORRECTIVE ACTION

The OCHCA and the RWQCB administer the UST corrective action program at former MCAS El Toro pursuant to RCRA Subtitle I and Section 25280-25299.8 of the California HSC. The authority of OCHCA and the RWQCB to require corrective action at UST sites is set forth at Title 23 CCR, division 3, chapter 16.

These regulations specifically define "corrective action" as "...any activity necessary to investigate and analyze the effects of an unauthorized release; propose a cost-effective plan to adequately protect human health, safety, and the environment and to restore or protect current and potential beneficial uses of water; and implement and evaluate the effectiveness of the activity(ies)..." (Title 23 CCR Section 2720). Furthermore, Section 2725(c) of the regulations sets forth requirements for corrective action plans prepared by responsible parties and states that, "The regulatory agency shall concur with the corrective action plan after determining that implementation of the plan will adequately protect human health, safety, and the environment and will restore and protect current or potential beneficial uses of water."

NFA letters issued by the RWQCB specifically stated that NFA determinations were based upon Section 2721(e) of those regulations which provides "Upon completion of required corrective action, the regulatory agency shall inform the responsible party in writing that no further work is required at that time, based on available information."

HSC Section 25296.10(a) provides that the State Water Resource Control Board "...shall develop corrective action requirements for health hazards and protection of the environment based on the

severity of the health hazards and the other factors listed in subdivision (b),..." HSC Section 25296.10(b) provides, "Any corrective action conducted pursuant to this chapter shall ensure protection of human health, safety, and the environment."

The corrective action cleanup standard for USTs implemented by the RWQCB and OCHCA are codified in HSC Section 25296.10(b), Title 23 CCR 2720 (definition of "corrective action") and Title 23 CCR 2725(c) (soil and water investigation phase, corrective action plan).

3.3 COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT

CERCLA response actions are initiated at environmental sites where CERCLA hazardous substances have been or may have been released. CERCLA response actions within the COs addressed in this FOST includes installation restoration program (IRP) sites.

A CERCLA response action has been completed at IRP Site 13 within CO III-D. Details regarding CERCLA response actions and the applicable restrictions for CO III-D are provided in Section 4.1.9. Except for preliminary investigation activities, such as soil sampling and exploratory trenching, no CERCLA response actions were required within the 12 remaining COs.

3.4 RESOURCE CONSERVATION AND RECOVERY ACT CORRECTIVE ACTION COMPLETE DETERMINATION

DTSC provided the following paragraphs summarizing the DTSC RCRA Corrective Action Complete Determination at former MCAS El Toro.

DTSC is the agency responsible for enforcing the hazardous waste laws and regulations in California. California was granted authorization by the EPA to administer a state hazardous waste program in lieu of the federal RCRA program. The Hazardous Waste Control Law codified in the HSC is the basic law that implements the waste management system in California. Section 25200.10 and 25187 of Chapter 6.5 of Division 20 of the HSC provides the authority to require corrective action at a hazardous waste facility. It states that DTSC, and any permit issued by DTSC, shall require corrective action for all releases of hazardous waste or constituents from a SWMU or a hazardous waste management unit. For the purpose of implementing corrective action, a hazardous waste facility is defined as all contiguous property under the control of the owner or operator of the facility (CCR, Title 22, Section 66260.10 [Definition of a Hazardous Waste Facility]). DTSC's determination that all corrective action has been completed for a portion of a facility eliminates the requirement to conduct further corrective action from the current and future owners of the property. Attachment 3 summarizes DTSC's intent to make the RCRA Corrective Action Complete Determination for portions of the former MCAS El Toro identified in FOST #4.

On November 22, 2008 a notice was published in the Los Angeles Times and the Orange County Register. The notice invited public review and comment on the DTSC's proposed RCRA Corrective Action Complete Determination and RCRA Hazardous Waste Facility Boundary Modification and on the DON's Draft Final FOST #4 for Carve-outs I-B, I-E, I-G, I-H, I-I, I-J, I-L, I-M, I-P, II-G, II-I, II-P, and III-D at the former MCAS El Toro. The same notice also discussed DTSC's proposed NOE prepared for the project under the CEQA. Additionally, DTSC mailed the public notice to all individuals on the MCAS El Toro mailing list (approximately 500) on November 21, 2008. The 45-day public comment period began on November 22, 2008 and continued through January 6, 2009. DTSC received no comments during the 45-day public comment period and has made a decision to approve the RCRA Corrective Action Complete Determination and the RCRA Hazardous Waste Facility Boundary Modification. The DON did not receive any public comments on the Draft Final

FOST #4. The Final RCRA Corrective Action Complete Determination Package can be found in Attachment 3.

4. SUMMARY OF ENVIRONMENTAL CONDITIONS AND NOTIFICATIONS

This section summarizes the environmental conditions and notifications as they relate to CERCLA and RCRA, petroleum products and derivatives, asbestos-containing materials (ACM), lead-based paint (LBP) and other regulated material within the COs.

Table 2 identifies the environmental notifications and requirements applicable to the COs. Based on an evaluation of the MCAS El Toro Environmental Baseline Survey (EBS) of September 2003 (Earth Tech 2003), hazardous substances, petroleum products, CERCLA and RCRA response actions, storage tanks, oil/water separators (OWSs), ACM, LBP, polychlorinated biphenyls (PCBs), silver recovery units (SRUs), and radiological investigation locations (RAD) were present or have occurred within the COs.

Additionally, the EBS identified several facilities/features as being associated with a potential release of contaminants to the environment. These locations were first identified during the preparation of the 2003 EBS, and are labeled as potential release locations (PRLs). Subsequently, the FFA signatories agreed that the DON would prepare investigation plans, perform field evaluations, and provide conclusions as to whether a PRL needed to be included in a specific regulatory clean-up program, or whether no further investigation was warranted. Table 3 identifies and provides the status of the PRLs within the CO areas. Based on additional records reviews and soil sampling it was determined that no significant release of hazardous substances or pollutants has occurred; therefore, no further action is warranted at the following PRLs: CO I-B - 439 (EPA 2008, DTSC 2008), 443 (DTSC 2004), and 651 (EPA 2003, DTSC 2003); CO I-H - PRL 51 (EPA 2005, DTSC 2005); CO I-I - 46 (EPA 2008, DTSC 2008), and 47 (EPA 2005a, DTSC 2005a); and CO I-J - 22 (EPA 2005c, DTSC 2005b).

Table 4 identifies locations of concern (LOCs) within the COs. LOCs are areas where a release is suspected to have occurred, a documented release has occurred, or based on the types of activities that occurred in the area, there was a potential for a release. The types of LOCs present within the COs include: hazardous substance sites, RCRA Facility Assessment (RFA) sites, temporary accumulation areas (TAAs), aerial photograph feature/anomaly (APHO) sites, IRP sites, ASTs, USTs, OWSs, SRUs, RAD sites, and PCB-containing transformers and equipment. LOCs within the COs proposed for transfer have received regulatory agency concurrence of NFA with the exception of on-going petroleum corrective actions in USTs 651-1, 651-2, 651-3, and 651-4 in CO I-B and UST 65A in CO I-M (Table 5). NFA designations are based on the findings of evaluations or cleanup actions that these LOCs are suitable for transfer as long as the applicable notifications and restrictions outlined in Sections 4 and 5 respectively are adhered to. This includes LOCs that meet the federal and state definitions of SWMUs and received NFA designations either because no corrective action was required to provide adequate protection of human health and the environment, or the required corrective action has been completed. A summary of LOCs by type is provided in the following subsections.

Past activities within the COs proposed for transfer included the use and storage of hazardous substances and petroleum products. A notice of hazardous substances and petroleum products stored, released, or disposed at specific sites within the COs proposed for transfer are listed in Attachments 4a - Petroleum Products, and 4b - Hazardous Substances Notifications.

4.1 CERCLA/RCRA

The following CERCLA/RCRA sites received closure NFA concurrence within the COs. Site closure actions are detailed in Table 4.

4.1.1 Carve-Out I-B (Figure 3)

RFA Sites - RFA 164 was associated with Building 651, and received site closure concurrence (DTSC 1996a).

TAA Sites - TAA sites 651A (DTSC 2003a) and 651B (DTSC 2006) received site closure concurrence.

SRUs - SRUs-1 and 2 were evaluated under PRLs 439, and 443, respectively, and it has been determined that no further action is required (EPA 2008, DTSC 2008) and (DTSC 2004), respectively.

RAD – The suspected former Radium Plaque Adaptometer Building site has received site closure concurrence from the California Department of Health Services (California Department of Health Services 2006) and the EPA (EPA 2005b).

4.1.2 Carve-Out I-E (Figure 4)

TAA Sites - TAA 2 received site closure concurrence (DTSC 2006a).

4.1.3 Carve-Out I-G (Figure 5)

TAA Sites - TAA sites 7 (DTSC 2006b) and 7B (DTSC 2003b) received site closure concurrence.

4.1.4 Carve-Out I-H (Figure 6)

TAA Sites - TAA 51 received site closure concurrence (DTSC 2006c).

4.1.5 Carve-Out I-I (Figure 7)

SRUs - SRU 3A was evaluated under PRL 46; it has been determined that no further action is required (EPA 2008 and DTSC 2008).

4.1.6 Carve-Out I-J (Figure 8)

TAA Sites - TAA 22 received site closure concurrence (DTSC 2006d).

4.1.7 Carve-Out II-G (Figure 12)

APHO Sites - APHO 118 received closure concurrence from the DTSC (DTSC 2007), and from the RWQCB (RWQCB 2007).

4.1.8 Carve-Out II-I (Figure 13)

RFA Sites - RFA 213 received site closure concurrence from the DTSC (DTSC 2003c), and from the RWQCB (RWQCB 2003).

TAA Sites - TAA 392A and 392B received site closure concurrence (DTSC 2003d).

4.1.9 Carve-Out III-D (Figure 15)

IRP Site - CO III-D contains Oil Change Area IRP Site 13, which received regulatory agency NFA concurrence from DTSC, U.S. EPA, and RWQCB. The selected remedy in the Record of Decision (ROD) signed on 30 September 1997, for Site 13 was no action (DoD 1997a). No deed restrictions were recommended for Site 13 due to chemicals present in the soil. However since the groundwater beneath Site 13 was contaminated by trichloroethylene (TCE) and tetrachloroethylene (PCE; also perchloroethylene) due to Site 24 – volatile organic compound (VOC) source area, when the NFA ROD was signed in 1997, the use restrictions prohibiting drilling of wells and/or extraction of groundwater and allowing access for groundwater monitoring and maintenance of equipment associated with groundwater remediation were to be addressed in the ROD for Operable Unit (OU)-1 Site 18 and OU-2A Site 24 (DON 1997). When the Final ROD for OU-1 Site 18 and OU-2A Site 24 was completed in 2002 (DON 2002), the updated VOC plume and 500 foot buffer zone were no longer located beneath Site 13. Consequently, groundwater restrictions due to the Site 24 VOC plume are no longer applicable for Site 13.

4.2 PETROLEUM PRODUCTS AND DERIVATIVES

The corrective action cleanup standards for petroleum USTs implemented by the RWQCB and OCHCA are codified in HSC Section 25296.10(b), Title 23 CCR 2720 (definition of "corrective action") and Title 23 CCR 2725(c) (soil and water investigation phase, corrective action plan). As noted in Section 3.1, DTSC has determined that investigations and cleanups conducted under the oversight of the RWQCB and OCHCA on property identified in this FOST as COs I-I, I-P, II-I, II-P, and III-D have satisfied the corrective action requirements under RCRA and the Hazardous Waste Control Law. Although CO I-L received NFA during the recent public comment period, it is not included in DTSC's RCRA Corrective Action Complete Determination. COs I-B and I-M require additional documentation in order to satisfy the corrective action requirements under RCRA. Site closure actions are detailed in Table 4.

4.2.1 Carve-Out I-B (Figure 3)

ASTs - ASTs 439 (RWQCB 2000) and 651 (RWQCB 2000a) received site closure concurrence.

USTs - USTs 439A, 439B (OCHCA 1996), 443 (RWQCB 1995), 651-5, 651-6, 651-7 (OCHCA 1997), 693A, and 693B (OCHCA 1996a) received site closure concurrence. USTs 651-1, 651-2, 651-3 and 651-4 received NFA for the unsaturated soils (vadose zone) (RWQCB 2008b), however, the groundwater associated with these tanks is part of an on-going petroleum corrective action (see Section 5.1 for restrictions).

OWSs - All necessary response actions related to OWS 651-8 (RWQCB 2000b) have been completed with a determination that no further action is necessary.

4.2.2 Carve-Out I-I (Figure 7)

ASTs - AST 47 received site closure concurrence (RWQCB 2002).

USTs - USTs 46 (OCHCA 1996b), 47A, and 47B (RWQCB 1999) received site closure concurrence.

4.2.3 Carve-Out I-L (Figure 9)

USTs - UST 254 (RWQCB 2008c) has received site closure concurrence.

4.2.4 Carve-Out I-M (Figure 10)

USTs - UST 65A is undergoing remedial actions for a petroleum release (See Section 5.1 for restrictions).

4.2.5 Carve-Out I-P (Figure 11)

USTs - USTs 75A (RWQCB 1995a), 75B (RWQCB 1996), 75C (RWQCB 2008), and 75D (OCHCA 2004) received site closure concurrence.

4.2.6 Carve-Out II-I (Figure 13)

USTs - USTs 308 (RWQCB 2006), 392A (OCHCA 1996c), 392B (OCHCA 1997a), 392C (OCHCA 1997b), 392D (RWQCB 2004), 392E, and 392F (OCHCA 1999) received site closure concurrence. UST 764A received site closure concurrence from the DTSC (DTSC 2006e), and the RWQCB (RWQCB 2006a).

OWSs - OWS 764B received site closure concurrence that no further action is necessary from DTSC in (DTSC 2006e), and from the RWQCB (RWQCB 2006a).

4.2.7 Carve-Out II-P (Figure 14)

ASTs - AST 637 received site closure concurrence (EPA 2003a, DTSC 2003).

USTs - USTs 637-1, 637-2, and 637-3 received site closure concurrence (RWQCB 2008a).

4.2.8 Carve-Out III-D (Figure 15)

USTs - USTs 176, 177, 178, 179, 180, 181, 182, 183, and T-5 received site closure concurrence from the RWQCB for vadose zone soil (RWQCB 2000c), and for groundwater (RWQCB 2007a).

4.3 ASBESTOS-CONTAINING MATERIAL

It is DoD policy to manage ACM in a manner protective of human health and the environment, and to comply with all applicable federal, state, and local laws and regulations governing ACM hazards (DoD 1994a). Therefore, unless it is determined by a competent authority that ACM on the property poses a threat to human health at the time of transfer, all property containing ACM will be conveyed, leased, or otherwise disposed "as is" through the BRAC process. If ACM in a building does pose a threat to human health or the environment, occupation of the building will be prohibited until the ACM is abated or the building is demolished by a transferee. Remediation of ACM is not required in buildings that are scheduled for demolition by the transferee.

There are a total of seven buildings within five of the COs proposed for transfer. Information on the existence, extent, and condition of ACM at buildings/structures/facilities is provided in Table 6.

4.4 LEAD-BASED PAINT

Notifications of potential LBP at buildings within the COs proposed for transfer are based on the age of construction (i.e., constructed before the Consumer Product Safety Commission's 1978 ban on LBP for residential use). The COs proposed for transfer contain buildings that were constructed prior to 1978 and may contain LBP. The age of many of the buildings on the property suitable for transfer suggests the likelihood that LBP may be present on some of these buildings. This in turn creates the possibility that, through the action of normal weathering and maintenance, there may be lead from LBP in the soil surrounding these buildings. The construction dates for each of the buildings within the COs are summarized in Table 1.

Demolition of non-residential buildings constructed prior to 1978 creates the possibility of lead being found in the soil as a result of such activities. With respect to any such non-residential buildings which the transferee intends to demolish and redevelop for residential use after transfer, the transferee may, under applicable law or regulation, be required by DTSC or other regulatory agencies to evaluate the soil adjacent to such non-residential buildings for soil-lead hazards, and to abate any such hazards that may be present, after demolition of such non-residential buildings and prior to occupancy of any newly constructed residential buildings.

4.5 POLYCHLORINATED BIPHENYLS

Ballasts in fluorescent light fixtures made prior to 1979 may contain sealed PCB-containing components. A survey of the station for PCB-containing light ballasts has not been conducted; however, it is assumed that buildings, structures, and facilities constructed prior to 1979 have PCBs in the ballasts of older light fixtures. It should be noted that many buildings that were constructed prior to 1979 have had interior renovations and new light fixtures installed that do not contain PCBs.

Fluorescent light ballasts manufactured before 1979 often contain PCB capacitors that may be disposed as municipal solid waste. No action is required at buildings, structures, and facilities unless large quantities of PCB-containing fluorescent light ballasts are removed. According to DON guidance on the disposal of fluorescent light ballasts containing PCBs (DON 1989), when a large quantity of PCB capacitors needs to be disposed, they should be handled as regulated PCB equipment. Fluorescent light ballasts that contain PCBs have approximately 1.0 to 1.5 ounces of PCB fluid in each capacitor. There are approximately 3.1 to 4.7 pounds of PCB fluid for every 50 PCB small capacitors in fluorescent light ballasts.

The disposal of PCBs is regulated under the federal Toxic Substances Control Act (TSCA) (15 U.S.C. Section 2601, et seq., as implemented by 40 Code of Federal Regulations Part 761), which banned the manufacture and distribution of PCBs, with the exception of PCBs used in enclosed systems. By federal definition, PCB equipment contains 500 parts per million (ppm) PCBs or more, whereas PCB-contaminated equipment contains PCB concentrations equal to or greater than 50 ppm, but less than 500 ppm. The TSCA regulates and the U.S. EPA enforces the removal and disposal of all sources of PCBs containing 50 ppm or more. Items containing PCBs below 50 ppm are classified by TSCA as non-PCB items and are not required to be removed from service.

4.5.1 Carve-Out I-B (Figure 3)

PCBs - There are two PCB non-transformer items within Building 439 and a pad-mounted transformer (PCB T-67) at Building 439 all with less than 4.2 ppm PCB concentrations. No evidence of a release has been identified for the transformer or equipment. There was one PCB non-transformer item within Building 651 with less than 1.0 ppm PCB concentration. This PCB non-transformer item was removed when the building was demolished (DTSC 2003e and EPA 2003a).

4.5.2 Carve-Out I-M (Figure 10)

PCBs - Transformers PCB T10, T11, and T12 were within CO I-M. No evidence of a release was identified at these transformers (DTSC 2003e and EPA 2003a).

4.5.3 Carve-Out III-D (Figure 15)

PCBs - Non-transformer PCB items PCB 176 and PCB 178, with 3.8 ppm, were removed during tank removal activities in 1995 (DTSC 2003e and EPA 2003a).

4.6 RADON

Radon is a naturally occurring, colorless, and odorless radioactive gas that is produced by radioactive decay of naturally occurring uranium. Uranium decays to radium, of which radon gas is a by-product. Radon is found in high concentration in rocks containing uranium such as granite, shale, phosphate, and pitchblende. Atmospheric radon is diluted to insignificant concentrations. Radon that is present in the soil, however, can enter a building through small spaces and openings, accumulating in enclosed areas such as basements. The cancer risk caused by exposure through the inhalation of radon is a topic of concern.

DoD policy is to disclose available and relevant radon assessment data pertaining to BRAC property being leased or transferred for inclusion in property lease/transfer documents. However, there is currently no federal requirement to perform follow-on radon assessment or mitigation in federal buildings, including those to be transferred to the public or private sector.

A radon survey was conducted at former MCAS El Toro in 1991. In accordance with DoD guidance (DoD 1994a), radon screening results were based upon a representative sampling of buildings. The buildings surveyed included the station hospital (Building 431), the childcare center (Building 656), and approximately 185 locations in the family housing areas. The results indicated that none of the buildings or housing units exceeded the radon threshold value of 4 picocuries per liter (pCi/l). Therefore, no mitigative action or further testing was recommended (JEG 1995). Based on these sampling results, it is anticipated that radon levels in other buildings at former MCAS El Toro should not be significantly different from those surveyed (levels should not exceed 4 pCi/l) (USMC/SWDIV 1999).

4.7 SCHOOL SITE CONSIDERATIONS

If, subsequent to transfer, any portions of the property found suitable to transfer by this FOST is considered for the proposed acquisition and/or construction of school properties using state funding, a separate environmental review process in compliance with the California Education Code section 17210 et seq. will need to be conducted by the transferee and approved by DTSC (Brownfields and Environmental Restoration Program). The California Education Code requires that a comprehensive evaluation of natural and manmade hazardous materials be conducted for school properties. This comprehensive evaluation requires additional investigation of hazardous materials outside the scope of CERCLA hazardous substances. This additional evaluation includes legally applied pesticides and herbicides, imported fill materials, naturally occurring hazardous substances such as heavy metals (e.g., chromium, mercury, nickel), metalloids (e.g., arsenic, selenium), gases (e.g., methane, hydrogen sulfide), radioactive elements (e.g., radon gas), and naturally-occurring petroleum deposits. The evaluation also includes ACM and LBP at concentrations that fall outside the scope of CERCLA. Any requirements associated with the evaluation of any property for compliance with the California Education Code are the sole responsibility of the transferee.

5. SUMMARY OF RESTRICTIONS

This section summarizes the restrictions associated with each of the CO areas proposed for transfer related to petroleum products and derivatives, ACM, and LBP. These restrictions on certain activities ensure that post-transfer use of the CO areas is consistent with protection of human health and the environment, and are environmentally suitable for transfer.

5.1 PETROLEUM PRODUCTS AND DERIVATIVES

The following sites have on-going corrective action requirements which will remain the responsibility of the DON after transfer. Additional details are provided in Table 5.

5.1.1 Carve-Out I-B (Figure 3)

USTs - USTs 651-1, 651-2, 651-3, and 651-4 are part of an ongoing petroleum corrective action related to groundwater. Therefore, land use restrictions for the petroleum plume area will be incorporated into the Quitclaim Deed and implemented in order to limit the exposure to petroleum and its derivatives and to maintain the integrity of corrective actions.

In order to protect present or future human health, safety, and the environment, the transferee shall refrain from the following acts within the area designated on Figure 3 without prior review and written approval from the DON and RWQCB until cleanup objectives have been achieved:

- Any activity that causes or facilitates the movement of known contaminated groundwater.
- Alteration, disturbance, or removal of any component of a corrective action, including but not limited to, groundwater extraction, injection, and monitoring wells (Table 7) and associated piping and equipment; or associated utilities;
- Extraction of groundwater and installation of new groundwater wells; and
- Removal of or damage to security features (for example, locks on monitoring wells, survey monuments, fencing, signs, or monitoring equipment and associated pipelines and appurtenances).

These restrictions may be released when the RWQCB has concurred that the cleanup objectives have been achieved and a release document is recorded with the county clerk.

5.1.2 Carve-Out I-M (Figure 10)

UST - UST 65A has not received regulatory concurrence. Therefore, land use restrictions for soil contamination will be incorporated into the Quitclaim Deed and implemented in order to limit the exposure to petroleum and its derivatives and to maintain the integrity of corrective actions until corrective action is complete and federal and state cleanup levels have been met.

In order to protect present or future human health, safety, and the environment, the transferee shall refrain from the following acts within the area designated in Figure 10 without prior review and written approval from the DON and RWQCB until cleanup objectives have been achieved:

- "Land disturbing activity" which includes but is not limited to:
 - Excavation of soil;
 - Any activity that involves movement of soil to the surface of the land from below the surface of the land; and
 - Any other activity that causes or facilitates the movement of known contaminated groundwater.
- Alteration, disturbance, or removal of any component of a corrective action, including but not limited to, groundwater extraction, injection, and monitoring wells and associated piping and equipment; or associated utilities;
- Extraction of groundwater and installation of new groundwater wells; and
- Removal of or damage to security features (for example, locks on monitoring wells, survey monuments, fencing, signs, or monitoring equipment and associated pipelines and appurtenances).

These restrictions may be released when the RWQCB has concurred that the cleanup objectives have been achieved and a release document is recorded with the County Clerk.

5.2 ASBESTOS-CONTAINING MATERIAL

5.2.1 Carve-Out I-B (Figure 3)

Building 439 - This building is classified as containing friable, accessible, and damaged (FAD) ACM. Except for short-term and emergency maintenance, access, use, or occupancy is prohibited pending either (1) completion of ACM surveys and completion of any necessary ACM abatement, or (2) demolition by the transferee, in accordance with all applicable local, state, and federal laws and other requirements relating to asbestos or ACM. Pending completion of abatement or demolition, the transferee shall manage the ACM in accordance with all such applicable local, state, and federal laws and requirements.

5.2.2 Carve-Out II-I (Figure 13)

Building 392 - This building is classified as containing FAD ACM. Except for short-term and emergency maintenance, access, use, or occupancy is prohibited pending either (1) completion of ACM surveys and completion of any necessary ACM abatement, or (2) demolition by the transferee, in accordance with all applicable local, state, and federal laws and other requirements relating to asbestos or ACM. Pending completion of abatement or demolition, the transferee shall manage the ACM in accordance with all such applicable local, state, and federal laws and requirements.

Buildings 308 and 764 - These buildings require an ACM Survey. Buildings require a survey if they have never been surveyed for ACM; non-FAD ACM was detected in a survey that was conducted prior to but not since 1997 (i.e., not within the last 3 years of station operation) or they were surveyed for FAD ACM only and, therefore, the presence of non-FAD ACM is unknown. Except for short-term and emergency maintenance, access, use, or occupancy is prohibited pending either (1) completion of ACM surveys and completion of any necessary ACM abatement, or (2) demolition by the transferee, in accordance with all applicable local, state, and federal laws and other requirements relating to asbestos or ACM. Pending completion of abatement or demolition, the transferee shall manage the ACM in accordance with all such applicable local, state, and federal laws and requirements.

5.2.3 Carve-Out II-P (Figure 14)

Building 637 - This building requires an ACM Survey. Buildings require a survey if they have never been surveyed for ACM; non-FAD ACM was detected in a survey that was conducted prior to but not since 1997 (i.e., not within the last 3 years of station operation) or they were surveyed for FAD ACM only and, therefore, the presence of non-FAD ACM is unknown. Except for short-term and emergency maintenance, access, use, or occupancy is prohibited pending either (1) completion of ACM surveys and completion of any necessary ACM abatement, or (2) demolition by the transferee, in accordance with all applicable local, state, and federal laws and other requirements relating to asbestos or ACM. Pending completion of abatement or demolition, the transferee shall manage the ACM in accordance with all such applicable local, state, and federal laws and requirements.

5.3 LEAD-BASED PAINT

In its use and occupancy of the property, including but not limited to demolition of buildings, structures, and facilities, and identification and/or evaluation of any LBP hazards, the transferee shall be responsible for managing LBP and LBP hazards in accordance with applicable local, state, and federal laws, and other requirements relating to LBP and LBP hazards.

5.3.1 Carve-Out I-B (Figure 3)

Building 439 (1959) - Nonresidential buildings constructed prior to 1978 may not be used for residential use or child-occupied buildings unless the transferee performs any necessary evaluation(s) and abatement in accordance with all local, state, and federal laws and other applicable requirements.

5.3.2 Carve-Out I-G (Figure 5)

Building 7 (1943) - Nonresidential buildings constructed prior to 1978 may not be used for residential use or child-occupied buildings unless the transferee performs any necessary evaluation(s) and abatement in accordance with all local, state, and federal laws and other applicable requirements.

5.3.3 Carve-Out II-I (Figure 13)

Building 308 (1944), Building 392 (1955) - Nonresidential buildings constructed prior to 1978 may not be used for residential use or child-occupied buildings unless the transferee performs any necessary evaluation(s) and abatement in accordance with all local, state, and federal laws and other applicable requirements.

5.3.4 Carve-Out II-P (Figure 14)

Building 637 (<1973) - Nonresidential buildings constructed prior to 1978 may not be used for residential use or child-occupied buildings unless the transferee performs any necessary evaluation(s) and abatement in accordance with all local, state, and federal laws and other applicable requirements.

5.3.5 Carve-Out III-D (Figure 15)

Building 26 (1943) - Nonresidential buildings constructed prior to 1978 may not be used for residential use or child-occupied buildings unless the transferee performs any necessary evaluation(s) and abatement in accordance with all local, state, and federal laws and other applicable requirements.

6. ADJACENT PROPERTIES

Nine of the 13 COs in the FOST are surrounded by property that was transferred in the initial MCAS El Toro FOST of July 2004 (DON 2004a). As the land areas of the earlier FOST were found suitable for transfer, they pose no negative effects on the COs proposed for transfer in this FOST. The four COs in this FOST that are adjacent to COs requiring additional remediation are described below.

6.1 CARVE-OUT I-B (FIGURE 3)

This CO adjoins CO I-Q which contains an abandoned petroleum UST. UST 367 on adjacent CO I-Q is a 2,500-gallon diesel tank that was abandoned in February 1994. The soil boring analytical data indicates that the contamination is confined to the area immediately adjacent to the UST site which is approximately 320 feet from the edge of CO I-B and there is no groundwater contamination at UST 367; therefore, there is no possibility of future contamination to CO I-B from the abandoned UST 367.

6.2 CARVE-OUT I-G (FIGURE 5)

This CO adjoins CO I-F which contains groundwater that contains VOC contaminants. A 300-foot buffer zone around the maximum predicted extent of the groundwater plume, as indicated by the groundwater model, is designed to prevent construction of groundwater extraction wells that could cause the plume to migrate and impact the cleanup remedy. Because CO I-G is outside the 300-foot buffer zone and remedial actions are underway for the Site 16 plume, no impact to CO I-G is anticipated.

6.3 CARVE-OUT II-G (FIGURE 12)

This CO borders COs II-H and II-M. CO II-H is a former landfill site that was closed in 1955. Due to the extent of the landfill buffer zone and the fact that the landfill has been closed for an extended period of time prior to the remediation of CO II-G, there is no danger of landfill contamination spreading to CO II-G, or any other previously transferred property. CO-II-M includes a former skeet range with an extensive buffer zone. Due to the fact that the skeet range was closed prior to the remediation of CO II-G, there is no danger of post-transfer contamination to CO II-G.

6.4 CARVE-OUT III-D (FIGURE 15)

This CO has a common border to the south with CO III-B. The primary contaminant of CO III-B is a groundwater plume that is presently under remediation as IRP Site 24. When the Final ROD for OU-1 Site 18 and OU-2A Site 24 was completed in 2002 (DON 2002), the updated plume and 500 foot buffer zone were no longer located beneath CO III-D. Consequently, groundwater restrictions due to the Site 24 VOC plume are not applicable to CO III-D. Also, within CO III-B is former LOC TAA 765 immediately adjacent to CO III-D that received regulatory NFA concurrence on November 17, 1998 (DTSC 1998).

7. COVENANTS

The deed for transfer of any property on which “any hazardous substance was stored for one year or more, [or] known to have been released, or disposed...” as a result of former activities conducted by the U.S., will include a covenant made pursuant to CERCLA Section 120(h)(3)(A)(ii)(I) and (II). The covenant will warrant “that all remedial action necessary to protect human health and the environment with respect to any such substances remaining on the property has been taken before the date of such transfer” and “that any additional remedial action found to be necessary after the date of such transfer shall be conducted by the U.S.” This covenant will not apply to any remedial action required on COs that is the result of an act or omission of the transferee that causes a new release of hazardous substances. COs I-L, I-M, I-P, and II-P were only contaminated by petroleum or its derivatives, therefore, COs I-L, I-M, I-P, and II-P shall be conveyed “as is” without a CERCLA covenant.

8. ACCESS CLAUSE

The deed will reserve and the transferee shall grant to the U.S. (DON and U.S. EPA) access to COs I-B, I-E, I-G, I-H, I-I, I-J, II-G, II-I, and III-D pursuant to CERCLA Section 120(h) (3) (A) (iii). DTSC, RWQCB, U.S. EPA and their successors and assigns shall also be granted access to the COs in any case in which remedial action or corrective action is found to be necessary after the date of transfer. In addition, the deed will provide for a right of access for the U.S. and RWQCB to traverse property owned by the transferee to gain access to COs I-B and I-M for the on-going petroleum corrective actions.

January 2009

Final Finding of Suitability to Transfer #4
Former MCAS El Toro, California

Finding of Suitability
to Transfer

9. FINDING OF SUITABILITY TO TRANSFER

Based on the information contained in this FOST and the notices, restrictions, and covenants that will be contained in the deed, COs I-B, I-E, I-G, I-H, I-I, I-J, I-L, I-M, I-P, II-G, II-I, II-P, and III-D at former MCAS El Toro are suitable for transfer.

Date: 1/21/09

Signature: Laura Duchnak
Laura Duchnak
Director BRAC PMO West

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Tables

Table 1: Buildings/Structures/Facilities

Carve Out	Building/Structure/ Facility Number	Building/Structure/Facility Name/Description	Year of Construction	Square Feet
I-B	439	Branch Dental/Medical Clinic	1959	70,167
I-G	7	Storage	1943	10,370
II-I	308	Ground Support Equipment Storage	1944	720
II-I	392	Aircraft Ground Support Equipment	1955	6,400
II-I	764	Vehicle Washrack Utility Building	1984	228
II-P	637	Exchange Gas Station	<1973	Unknown
III-D	26	Communications Shop	1943	6,240

Note: Buildings/structures/facilities that have been demolished or removed are not shown.

< = before

Table 2: Environmental Requirements and Notifications

Environmental Factors Considered	Applicable to Property												
	Carve Out												
	I-B	I-E	I-G	I-H	I-I	I-J	I-L	I-M	I-P	II-G	II-I	II-P	III-D
Presence of Hazardous Substances (Notification)	Y	Y	Y	Y	Y	Y	N	Y	N	Y	Y	N	Y
CERCLA/RCRA (Response/Corrective Action)	Y	Y	Y	Y	Y	Y	N	Y	N	Y	Y	N	Y
Presence of Petroleum Products and Derivatives	Y	N	N	N	Y	N	Y	Y	Y	N	Y	Y	Y
UST/AST Storage Tanks (Closure/Removal)	Y	N	N	N	Y	N	Y	Y	Y	N	Y	Y	Y
Munitions and Explosives of Concern – Response Actions	N	N	N	N	N	N	N	N	N	N	N	N	N
Asbestos-Containing Material	Y	N	N	N	N	N	N	N	N	N	Y	Y	N
Lead-Based Paint (Non-Residential Buildings)	Y	N	Y	N	N	N	N	N	N	N	Y	Y	Y
Polychlorinated Biphenyls	Y	N	N	N	N	N	N	Y	N	N	N	N	Y
Radon	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
School Site Considerations	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y

AST = aboveground storage tank
 CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act
 N = No
 RCRA = Resource Conservation and Recovery Act
 UST = underground storage tank
 Y = Yes

Table 3: Potential Release Locations

LOC ID	Building Number/ Location	Description	Closure Report Title/Date	NFI Letter Agency/Date	Notes
Carve-Out I-B					
PRL 439	439	Medical and Dental Facility	Draft Summary Report for Group IV PRLs by Earth Tech (March 2008)	EPA – 4/17/2008 DTSC – 8/21/2008	NFI status identified in Draft Summary Report for Group IV PRLs (Earth Tech 2008) and EPA concurrence obtained. NFI Status identified in DTSC letter dated 8/21/2008.
PRL 443	Demolished	Silver Recovery Unit	Technical Memorandum SRU 2, 9/9/2002, Final EBS, Sept. 2003, and Information Package Technical Memorandum for SRU 2, 2/11/2004	DTSC – 3/23/2004	PRL 443 is also known as SRU 2 associated with photograph developing equipment in former Building 443. Historical record search, visual inspection, and soil sampling was conducted from 2002 to 2003. NFI status identified in DTSC letter dated 3/23/2004
PRL 651	Demolished	Exchange Auto Repair Station	Final EBS (Sept. 2003) by Earth Tech	EPA – 4/24/2003 DTSC – 4/11/2003	Facility contained hydraulic lifts, hydraulic hoist pits, and an AST. The building was used as an exchange service station. A utility trench, floor drains and service sink, and parts dip tank were noted during the VSI. Sampling investigation of this facility was conducted in 2003. Contaminant concentrations identified were below action levels. No further action is required per DTSC letter dated 4/11/2003.
Carve-Out I-H					
PRL 51	Demolished	Automobile Organization Shop	Summary Report for Group II PRLs by Earth Tech (March 2005a)	EPA – 4/07/2005 DTSC – 11/02/2005	NFI status identified in Summary Report for Group II PRLs (Earth Tech 2005a) and regulatory concurrence obtained. All NFI actions completed.
Carve-Out I-I					
PRL 46	Demolished	Reproduction Office	Draft Summary Report for Group IV PRLs by Earth Tech (March 2008)	EPA – 4/17/2008 DTSC – 8/21/2008	NFI status identified in Draft Summary Report for Group IV PRLs (Earth Tech 2008) and EPA concurrence obtained. DTSC provided comments on PRL 46 in their Group IV PRLs comments letter dated 4/30/2008. All NFI actions completed. NFI Status identified in DTSC letter dated 8/21/2008.
PRL 47	Demolished	Paint and Dope Shop/Paint Booth	Summary Report for Group I PRLs by Earth Tech (March 2005)	EPA – 3/16/2005 DTSC – 7/13/2005	NFI status identified in Summary Report for Group I PRLs (Earth Tech 2005) and regulatory concurrence obtained. All NFI actions completed.
Carve-Out I-J					
PRL 22	22	Electronics & Communications Shop	Summary Report for Group I PRLs by Earth Tech (March 2005)	EPA – 4/7/2005 DTSC – 7/13/2005	PRL 22 was evaluated within the Group I PRL Investigations. DTSC and EPA concurred with the NFA recommendation for PRL 22 in letters dated 7/13/2005 and 4/7/2005, respectively.

AST	=	Aboveground Storage Tank	SRU	=	Silver Recovery Unit
DTSC	=	Department of Toxic Substance Control	VSI	=	visual site inspection
EBS	=	Environmental Baseline Survey			
EPA	=	Unites States Environmental Protection Agency			
ID	=	Identification			
LOC	=	Location of Concern			
NFI	=	No Further Investigation			
PRL	=	Potential Release Location			

Table 4: Locations of Concern

LOC ID	Building Number/ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes
Carve-Out I-B					
RFA 164	Demolished	Vehicle Wash Rack 651	Final RCRA Facility Assessment (RFA) Report 7/1993 and Final Addendum to RFA Report 5/1996	DTSC 7/23/1996	Inactive vehicle wash rack. Site was identified in the RFA and has been investigated. DTSC concurred with NFA recommendation in a letter dated 7/23/1996. No further action required.
TAA 651A	Demolished	< 90-Day Accumulation Point	Summary Report for Former TAA 651A 10/15/2001 & Information Package on 1/7/2003 & 10/8/2003	DTSC 10/15/2003	TAA 651A was a metal storage shed located northwest quadrant of the Station on the loading dock of Building 651. Sampling results below residential PRGs. DTSC concurred with NFA recommendation in a letter dated 10/15/2003. No further action required
TAA 651B	Demolished	< 90-Day Accumulation Point	Summary Report for Former TAA 651B 10/15/2001 & Information Package on 6/7/2006	DTSC 6/22/2006	Former accumulation area on asphalt-paved area adjacent to Building 651. TAA 651B is located northwest quadrant of the Station. Sampling results below residential PRGs. DTSC concurred with NFA recommendation in a letter dated 6/22/2006. No further action required
AST 439	439	500-Gallon Propane Tank	Summary Report, Former AST Sites 245 & 439 7/5/2000	RWQCB 8/28/2000	Horizontal tank; tank has been removed; no releases identified; NFA decision date of 8/28/2000. No further action required.
AST 651	Demolished	1,000-Gallon Propane Tank	Summary Report, former AST 651 7/19/1999	RWQCB 8/28/2000	Horizontal tank; tank formerly situated on west side of Building 651; tank has been removed; no releases identified; NFA decision date of 8/28/2000. No further action required.
UST 439A	439	5,000-Gallon Fuel Oil Tank	Tank Removal Field Activities 9/30/1993	OCHCA 12/9/1996	Tank removed in 1993. Site closed by OCHCA in a letter dated 12/9/1996. No further action required.
UST 439B	439	5,000-Gallon Fuel Oil Tank	Tank Removal Field Activities 7/15/1993	OCHCA 12/9/1996	Removal completed 2/28/1994. Site closed by OCHCA in a letter dated 12/9/1996. No further action required.
UST 443	Demolished	1,000-Gallon Diesel Tank	Site Assessment Report, UST 443 9/1995	RWQCB 12/12/1995	Removal completed 2/28/1994. Site closed by RWQCB in a letter dated 12/12/1995. No further action required.

Table 4: Locations of Concern

LOC ID	Building Number/ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes
UST 651-1	Demolished	12,000-Gallon Unleaded Fuel Tank	Summary Report, SVE Operations and Confirmation Sampling Activities 2008	RWQCB 11/4/2008	Tank has been removed. Remediation conducted during 2000. Vadose zone SVE treatment has been completed and closure documentation submitted on 2/26/2008. MNA Evaluation and Long-term Monitoring Plan for groundwater submitted on 5/29/2008. RWQCB concurred with NFA recommendation for vadose zone in a letter dated 11/4/2008. Navy will retain access to the site to allow for ongoing sampling and maintenance of existing groundwater monitoring network.
UST 651-2	Demolished	12,000-Gallon Unleaded Fuel Tank	Summary Report, SVE Operations and Confirmation Sampling Activities 2008	RWQCB 11/4/2008	Tank has been removed. Remediation conducted during 2000. Vadose zone SVE treatment has been completed and closure documentation submitted on 2/26/2008. MNA Evaluation and Long-term Monitoring Plan for groundwater submitted on 5/29/2008. RWQCB concurred with NFA recommendation for vadose zone in a letter dated 11/4/2008. Navy will retain access to the site to allow for ongoing sampling and maintenance of existing groundwater monitoring network.
UST 651-3	Demolished	12,000-Gallon Unleaded Fuel Tank	Summary Report, SVE Operations and Confirmation Sampling Activities 2008	RWQCB 11/4/2008	Tank has been removed. Remediation conducted during 2000. Vadose zone SVE treatment has been completed and closure documentation submitted on 2/26/2008. MNA Evaluation and Long-term Monitoring Plan for groundwater submitted on 5/29/2008. RWQCB concurred with NFA recommendation for vadose zone in a letter dated 11/4/2008. Navy will retain access to the site to allow for ongoing sampling and maintenance of existing groundwater monitoring network.
UST 651-4	Demolished	12,000-Gallon Unleaded Fuel Tank	Summary Report, SVE Operations and Confirmation Sampling Activities 2008	RWQCB 11/4/2008	Tank has been removed. Remediation conducted during 2000. Vadose zone SVE treatment has been completed and closure documentation submitted on 2/26/2008. MNA Evaluation and Long-term Monitoring Plan for groundwater submitted on 5/29/2008. RWQCB concurred with NFA recommendation for vadose zone in a letter dated 11/4/2008. Navy will retain access to the site to allow for ongoing sampling and maintenance of existing groundwater monitoring network.
UST 651-5	Demolished	500-Gallon Waste Oil Tank	Tank Removal and Site Closure Report, USTs 651-5, 651-6, and 651-7 6/12/1997	OCHCA 7/11/1997	Removal completed on 4/15/1997. Site closed by OCHCA in a letter dated 7/11/1997. No further action required.

Table 4: Locations of Concern

LOC ID	Building Number/ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes
UST 651-6	Demolished	500-Gallon Motor Oil Tank	Tank Removal and Site Closure Report, USTs 651-5, 651-6, and 651-7 6/12/1997	OCHCA 7/11/1997	Removal completed on 4/15/1997. Site closed by OCHCA in a letter dated 7/11/1997. No further action required.
UST 651-7	Demolished	500-Gallon Motor Oil Tank	Tank Removal and Site Closure Report, USTs 651-5, 651-6, and 651-7 6/12/1997	OCHCA 7/11/1997	Removal completed on 4/18/1997. Site closed by OCHCA in a letter dated 7/11/1997. No further action required.
UST 693A	Demolished	500-Gallon Diesel Tank	Closure Report/Final Report, Tank 693A 1/22/1992	OCHCA 11/7/1996	Tank has been removed. Site closed by OCHCA in a letter dated 11/7/1996. No further action required.
UST 693B	Demolished	500-Gallon Diesel Tank	Closure Report/Final Report, Tank 693B 1/22/1992	OCHCA 11/7/1996	Tank has been removed. No evidence of a release was identified. Site closed by OCHCA in a letter dated 11/7/1996. No further action required.
OWS 651-8	Demolished	280-Gallon Oil/Water Separator 651	Site Assessment Report, OWS Site 651-8 3/12/1999	RWQCB 9/28/2000	OWS was closed in place. OWS was not associated with a UST. Site was investigated, and no significant soil contamination was identified at this site based on the results of soil sampling. Site closed by RWQCB in a letter dated 9/28/2000. No further action required.
SRU-1	439	Medical and Dental Facility 439	Draft Summary Report for Group IV PRLs March 2008	EPA 4/17/2008 DTSC 8/21/2008	SRU 1 was further investigated as PRL 439. NFI Status identified in Draft Summary Report for Group IV PRLs and EPA concurrence obtained, NFI Status identified in DTSC letter dated 8/21/2008.
SRU-2	Demolished	Silver Recovery Unit	Technical Memorandum SRU 2, September 9, 2002, Final EBS, Sept. 2003, and Information Package Technical Memorandum for SRU 2, 2/11/2004	DTSC 3/23/2004	SRU 2 associated with photograph developing equipment in Building 443. Historical record search, visual inspection, and soil sampling was conducted from 2002 to 2003 SRU 2 was further evaluated as PRL 443. NFI Status identified in DTSC letter dated 3/23/2004
PCB T67	439	PCB T67	Final EBS, Sept. 2003	DTSC 9/25/2003 EPA 9/25/2003	Removed. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.

Table 4: Locations of Concern

LOC ID	Building Number/ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes
RAD	Unknown	Suspected Former Radium Plaque Adaptometer Building was identified on a 1944 drawing as being situated on "C" Street, approximately two blocks north of the Trabuco Road Station Gate.	Final Radiological Release Report RAD ADAPT Bldg. June 2006	CDHS 6/19/2006 EPA 9/12/2005	Building may have been part of a dispensary and would have been used for testing the night vision of personnel. The only radioactive equipment that would have been used within the facility was a metal disc coated with radium/phosphor compound encapsulated in transparent plastic. Night vision testing was discontinued in 1951. Building may never have been constructed because there was no building number assigned to the building, no construction drawings, and no evidence of a building (i.e., foundation, disturbed soil, etc.). Although, it could not be determined whether the building was ever constructed at former MCAS El Toro, the 2000 HRA recommended further radiological investigation for the area associated with the footprint of this suspected building. During the year 2000, a stationwide HRA was conducted. The HRA recommended further radiological investigation for the Suspected Former Radium Plaque Adaptometer Building prior to final disposition. A radiological survey was completed in 2001 and the results were presented in a Final Radiological Release Report dated June 2006. CDHS agreed with the findings of the report and granted NFA including unrestricted release on 6/19/2006.
Carve-Out I-E					
TAA 2	Demolished	< 90-Day Accumulation Point/Hazardous Materials Storage	Closure Report For Temporary Accumulation Area Site 2, Former Marine Corps Air Station, El Toro, Irvine, California 7/2006.	DTSC 9/6/2006	Former TAA Site 2 consisted of two units: Unit 1 was approximately 150 feet long by 100 feet wide and was located southwest of Building 2; Unit 2 was approximately 100 feet wide by 100 feet wide and was located northeast of Building 2. Visual inspections were conducted and soil samples were collected from eight locations at Former TAA Site 2 during 2005. A closure report with a screening risk evaluation was completed in 2006. DTSC concurred with NFA. No further action required.
Carve-Out I-G					
TAA 7	7	< 90-Day Accumulation Point	Summary Report for Former TAA 7 11/30/2005	DTSC 3/16/2006	Former TAA 7 was located northeast of Building 7 near the edge of the aircraft parking apron. The site was approximately 10 feet wide by 20 feet long, and paint storage lockers were previously located on the site. Soil samples were collected from borings and visual inspections were conducted at Former TAA 7 during 1995 and during 2005. A Summary Report with a screening risk evaluation was submitted in 2005. DTSC concurred with no further action in their letter dated 3/16/2006. No further action required.

Table 4: Locations of Concern

LOC ID	Building Number/ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes
TAA 7B	7	< 90-Day Accumulation Point	Summary Report, TAA 7B 7/17/2002	DTSC 3/4/2003	TAA 7B was located approximately 100 feet southwest of Building 7. Drums were stored at the site from approximately 1992 through 1996. Historical records were reviewed, visual inspections were conducted, and the findings were presented in a Summary Report dated 2002. No further action is required.
Carve-Out I-H					
TAA 51	Demolished	< 90-Day Accumulation Point	Closure Report Fromer TAA 51 July 2006	DTSC 8/14/2006	SWMU/AOC 33. Former TAA 51 is located Northeast corner of Building 51. Soil sampling was performed A Summary Report with a screening risk evaluation was submitted in 2006. DTSC concurred with no further action status for TAA 51 in their letter dated 8/14/2006. No further action required.
Carve-Out I-I					
AST 47	Demolished	25-Gallon Diesel Tank	Information Package, AST 47 5/1/2002	RWQCB 9/5/2002	Diesel dry tank for boilers. Tank was closed in place. RWQCB concurred with NFA in a letter dated 9/5/2002. No further action required.
UST 46	Demolished	500-Gallon Diesel Tank	Closure Report/Final Report Tank 46 12/7/1992	OCHCA 11/12/1996	Removal completed on 2/6/1992. Site closed by OCHCA in a letter dated 11/12/1996. No further action required.
UST 47A	Demolished	1,500-Gallon Diesel Tank	Tank Removal and Site Closure Report, UST 47A and 47B 5/18/1998	RWQCB 8/2/1999	Removal completed on 4/10/1997. Site closed by RWQCB in a letter dated 8/2/99. No further action required.
UST 47B	Demolished	1,500-Gallon Diesel Tank	Tank Removal and Site Closure Report, UST 47A and 47B 5/18/1998	RWQCB 8/2/1999	Removal completed on 4/10/1997. Site closed by RWQCB in a letter dated 8/2/1999. No further action required.
SRU 3A	Demolished	Reproduction Office	Draft Summary Report for Group IV PRLs March 2008	EPA 4/17/2008 DTSC 8/21/2008	SRU 3A was further investigated and sampled as PRL 46. NFI status identified in Draft Summary Report for Group IV PRLs and EPA concurrence obtained for NFI. NFI Status identified in DTSC letter dated 8/21/2008.

Table 4: Locations of Concern

LOC ID	Building Number/ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes
Carve-Out I-J					
TAA 22	Demolished	< 90-Day Accumulation Point	Closure Report, Former Temporary Accumulation Area 22 11/4/2003.	DTSC 7/31/2006	Former TAA 22 included two units, each with a concrete pad, sump, and canopy; each unit was approximately 35 feet long and 15 feet wide. TAA 22 was located east of Building 22. A visual inspection was conducted, soil samples were collected from borings during 2003, and a closure report with a screening risk evaluation was completed. DTSC provided comments in 2006 and a response to comments was completed in 2006. DTSC concurred with no further action in their letter dated 7/31/2006. No further action required.
Carve-Out I-L					
UST 254	Demolished	1,400-Gallon Fuel Oil Tank	Closure Report, UST 254 & Addendums of Data Summary November 2008	RWQCB 12/2/2008	Tank has been removed. Excavation activities to remove subsurface contaminated soil have been completed as of 4/21/2008. Additional groundwater sampling was completed on 9/26/2008. Site closed by RWQCB in a letter dated 12/2/2008. No further action required.

Table 4: Locations of Concern

LOC ID	Building Number/ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes
Carve-Out I-M					
UST 65A	Demolished	1,400-Gallon Fuel Oil Tank	N/A	N/A	Tank removal completed on 7/19/1997. Site is under investigation. Further action on going.
PCB T10	Demolished	PCB Transformer on a Pole.	Final EBS, Sept. 2003	DTSC 9/25/2003 EPA 9/25/2003	Removed. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS
PCB T11	Demolished	PCB Transformer on a Pole.	Final EBS, Sept. 2003	DTSC 9/25/2003 EPA 9/25/2003	Removed. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.
PCB T12	Demolished	PCB Transformer on a Pole.	Final EBS, Sept. 2003	DTSC 9/25/2003 EPA 9/25/2003	Removed. 1994 field survey indicates no evidence of release. No PCB releases identified through the records search or VSIs conducted for the 2003 EBS.
Carve-Out I-P					
UST 75A	Demolished	500-Gallon Diesel Tank	Site Assessment Report, UST 75A 8/1995	RWQCB 12/12/1995	Removal completed on 2/6/1992. Site closed by RWQCB in a letter dated 12/12/1995. No further action required.
UST 75B	Demolished	500-Gallon Diesel Tank	Site Assessment Report, UST 75B 1/1996	RWQCB 3/12/1996	Removal completed on 2/6/1992. Site closed by RWQCB in a letter dated 3/12/1996. No further action required.
UST 75C	Demolished	500-Gallon Diesel Tank	Site Assessment Report, UST 75C 2007	RWQCB 1/15/2008	Building 75 and loading dock were demolished during the period of April through July 2007. On 7/6/2007 UST 75C was removed and further excavation was conducted to excavate and remove subsurface contaminated soils. Approximately 98 tons of petroleum contaminated soil was removed from the site. A Closure Report was prepared and submitted to RWQCB Santa Ana Region in 2007. Site was closed by the RWQCB in a letter dated 1/15/2008. No Further Action is required.
UST 75D	Demolished	550-Gallon Heating Oil Tank	Removal and Disposal of UST 75D on 3/10/2004	OCHCA 5/25/2004	UST 75D was located in Northeast corner of Building 75. Fill pipe and vent pipe identified in November 2003. Tank exposed and approximately 200 gallons of liquid pumped from tank in December 2003. Remaining liquid was removed, tank was removed from site, and soil samples were collected in March 2004. A closure report was submitted to OCHCA in April 2004 and NFI letter from OCHCA was received in May 2004.

Table 4: Locations of Concern

LOC ID	Building Number/ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes
Carve-Out II-G					
APHO 118	Demolished	Disturbed Ground Perimeter Road	Supplementary Information Package for APHO 118 10/19/2006	DTSC 3/25/2007 RWQCB 1/16/2007	Identified on a 1979 photograph. A large area of disturbed ground (200 by 250 feet) was noted in this photograph. This area is located near Anomaly Area 5, containing APHOs 31, 43, 66, 67, and 68. Four of these anomalies are areas of disturbed ground. After investigation of Anomaly Area 5, a no further action declaration was granted in February 2003. APHO 118 borders the northeastern end of the investigation area for IRP Site 5, Perimeter Road Landfill. Due to the proximity of this APHO to IRP Site 5, further evaluation of this APHO was recommended during the development of a remedial program for IRP Site 5. Visual inspections and exploratory trenching was performed at APHO 118. Based on this investigations, RWQCB concurred with NFA on 1/16/2007 and DTSC concurred with NFA on 4/25/2007.

Table 4: Locations of Concern

LOC ID	Building Number/ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes
Carve-Out II-I					
RFA 213	764	Vehicle Wash Rack	Data Summary Report, Solid Waste Management Unit 213 12/13/2002 and Supplementary Information Package, Solid Waste Management Unit (SWMU) 213, Vehicle Washrack at Building 392 12/27/2002	RWQCB 2/20/2003 DTSC 3/3/2003	RFA 213, an abandoned vehicle wash rack, is located adjacent to the southeastern side of Building 392. The former UST 764A and the former OWS 764B, located adjacent to the northeastern side of the wash rack, were associated with this wash rack. Soil samples were collected from four shallow borings through the wash rack during the RFA sampling visit in 1992. Cracks in the wash rack were repaired during 1998. Additional soil samples were collected from five borings during 2002 in response to DTSC comments dated 3/30/2001. Based on sampling results and a screening risk evaluation, the RWQCB and DTSC have concurred with recommendation of no further action. No further action is required.
TAA 392A	392	< 90-Day Accumulation Point	Closure Report, TAA 392A and 392B 2/27/2001	DTSC 3/10/2003	TAA 392A was also known as SWMU/AOC 124. The TAA consisted of a concrete pad with berm, sump, and canopy, and was located north of Building 392. Soil samples were collected during the RFA Sampling Visit in 1992. Additional soil samples were collected during November 1999 and the results with a screening risk evaluation were presented in the Closure Report dated 2001. No further action is required.
TAA 392B	392	< 90-Day Accumulation Point	Closure Report, TAA 392A and 392B 2/27/2001	DTSC 3/10/2003	TAA 392B was also known as SWMU/AOC 271. The TAA consisted of a concrete pad with berm and a sump, and was located north of Building 392. Soil samples were collected during the RFA Sampling Visit in 1992. Additional soil samples were collected during November 1999 and the results with a screening risk evaluation were presented in the Closure Report dated 2001. No further action is required.
UST 308	308	280-Gallon Diesel Tank	Summary Report, Former UST Site 308 11/18/2005	RWQCB 5/1/2006	UST 308 was a 280-gallon steel fuel storage tank for the potable water system booster pump in Building 308. The tank site is located southwest of Building 308 and northeast of Building 392. UST 308 was removed in March 2003 and confirmation soil samples were collected with OCHCA oversight. The site was referred to the RWQCB by OCHCA on 6/6/2003. Soil samples were collected from three borings near the former tank excavation in October 2004 and the approximate extent of the petroleum-impacted soils was evaluated. The release appeared to be limited to a relatively small area near the concrete foundation for the former tank. The concrete foundation and approximately 10 tons of petroleum-impacted soils were excavated and removed in July 2005. The RWQCB assigned Geotracker ID T0605921683 to Former UST Site 308. No further action is required.

Table 4: Locations of Concern

LOC ID	Building Number/ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes
UST 392A	392	500-Gallon Unleaded Fuel Tank	Tank Removal Field Activities 8/15/1993	OCHCA 12/9/1996	UST 392A (also known as SWMU/AOC 298) and approximately 22 feet of associated piping were removed on 7/15/1993 under OCHCA plan check 92-283. The tank was located near the former boiler room at Building 392. Site closed by OCHCA in a letter dated 12/9/96. No further action required.
UST 392B	392	2,000-Gallon Gasoline Tank	Tank Removal Field Activities 12/18/1987	OCHCA 3/14/1997	UST 392B was removed on 12/18/1987. Site closed by OCHCA in a letter dated 3/14/97. No further action required.
UST 392C	392	400-Gallon Diesel Tank	Tank Removal and Site Closure Report, UST 392C 6/20/1997	OCHCA 7/11/1997	UST 392C was removed on 3/12/1997 under OCHCA plan check 96-193. The tank was located northeast of Building 392. Site closed by OCHCA in a letter dated 7/11/97. No further action required.
UST 392D	392	2,000-Gallon Gasoline Tank	Addendum Number 2 to Site Assessment Report, Former Underground Storage Tank 392D Site 2/26/2004	RWQCB 6/7/2004	UST 392D, a former diesel fuel storage tank, was removed in approximately 1987. A new fiberglass tank, UST 392F, was installed at the location of Former UST 392D, and UST 392F was removed with OCHCA oversight and closed in 1999. Soil samples were collected from several borings during the site assessment activities that were conducted at Former UST Site 392D during the period from 1999 through 2002. The vertical extent of the release is approximately 60 feet below ground surface based upon the results of the site assessment sampling activities. A site assessment addendum with an evaluation of the leaching potential of residual petroleum hydrocarbons was completed in 2004, and the RWQCB concurred with no further action status in their letter dated 6/7/2004. The RWQCB assigned Case Number 083003998T to Former UST Site 392D. No further action required.
UST 392E	392	2,000-Gallon Gasoline Tank	UST Removal Report, UST 392E 10/27/1999	OCHCA 12/9/1999	UST 392E, the fuel dispensing island, and approximately 30 feet of associated piping were removed on 9/9/1999. The tank was located south of Building 392. OCHCA closed the site on 12/9/1999. No further action is required.
UST 392F	392	2,000-Gallon Gasoline Tank	UST Removal Report, UST 392F 10/27/1999	OCHCA 12/9/1999	UST 392F, the fuel dispensing island, and approximately 30 feet of associated piping were removed on 9/9/1999. The tank was located along the southwestern side of Building 392. OCHCA closed the site on 12/9/1999. No further action is required.

Table 4: Locations of Concern

LOC ID	Building Number/ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes
UST 764A	764	500-Gallon Waste Oil Tank	Summary Report for Former UST 764A and OWS Site 764B Site 12/1/2005	RWQCB 5/16/2006 DTSC 7/31/2006	UST 764A (SWMU 214) and OWS 764B (SWMU 215) were located adjacent to SWMU 213 (a wash rack located adjacent to the southeast end of Building 392 near Building 764). Soil samples were collected adjacent to UST 764A during the RFA Sampling Visit in 1992. UST 764A, OWS 764B, and approximately 6 feet of associated piping were removed on 8/9/1999 with oversight by the OCHCA. Soil samples were collected from four borings during site assessment activities in 2000. Additional soil samples were collected from a boring near the center of the former tank excavation in 2005. The RWQCB concurred with NFA for UST 764A/OWS 764B on 5/16/2006, and DTSC concurred with NFA on 7/31/2006. The RWQCB assigned Geotracker ID T0605968363 to Former UST Site 764A/OWS Site 764B. No further action required.
OWS 764B	764	100-Gallon Oil/Water Separator	Summary Report for Former UST 764A and OWS Site 764B Site 12/1/2005	RWQCB 5/16/2006 DTSC 7/31/2006	UST 764A (SWMU 214) and OWS 764B (SWMU 215) were located adjacent to SWMU 213 (a wash rack located adjacent to the southeast end of Building 392 near Building 764). Soil samples were collected adjacent to UST 764A during the RFA Sampling Visit in 1992. UST 764A, OWS 764B, and approximately 6 feet of associated piping were removed on 9 August 1999 with oversight by the OCHCA. Soil samples were collected from four borings during site assessment activities in 2000. Additional soil samples were collected from a boring near the center of the former tank excavation in 2005. The RWQCB concurred with NFA for UST 764A/OWS 764B on 5/16/2006, and DTSC concurred with NFA on 7/31/2006. The RWQCB assigned Geotracker ID T0605968363 to Former UST Site 764A/OWS Site 764B. No further action required.

Table 4: Locations of Concern

LOC ID	Building Number/ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes
Carve-Out II-P					
AST 637	637	500-Gallon Propane Tank	Information Package, Aboveground Storage Tank 637 10/24/2001	DTSC approval of Sep, 2003 EBS on 9/25/2003 EPA 9/25/2003	AST 637, used for storage of propane, was removed on approximately 2/28/1999. No releases identified; no further action required; Determination of NFA was by concurrence with the 2003 EBS. No further action required. The Information Package published on 10/24/2001 is not a Closure Report. It was prepared subsequent to obtaining NFA concurrence to document and track the closure process.
UST 637-1	637	12,000-Gallon Unleaded Fuel Tank	Summary Report Former UST 637-1, 2, and 3 dated 12/27/07	RWQCB 3/12/2008	UST 637-1, UST 637-2, & UST 637-3 and approximately 836 feet of associated piping were removed on 8/19/1999 under OCHCA plan check PM99-054. Field activities are documented in the "Underground Storage Tank Removal Report, USTs 637-1, 637-2, 637-3, Marine Corps Air Station, El Toro, California" (Geofon 10/27/1999). Additional remedial excavation activities were conducted in October 2007 by ECS and Summary Report was submitted in December 2007. The RWQCB concurred with NFA on 3/12/2008.
UST 637-2	637	12,000-Gallon Unleaded Fuel Tank	See Notes for UST 637-1.	RWQCB 3/12/2008	See Notes for UST 637-1.
UST 637-3	637	12,000-Gallon Unleaded Fuel Tank	See Notes for UST 637-1.	RWQCB 3/12/2008	See Notes for UST 637-1.

Table 4: Locations of Concern

LOC ID	Building Number/ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes
Carve-Out III-D					
IRP 13	Demolished	Oil Change Area (OU-3)	Draft Final Record of Decision, OU 2A & 3A, No Action Sites 9/30/1997	EPA, DTSC, RWQCB 9/30/1997	Releases of crankcase oil. Site was in operation from 1977-1983. ROD signed in September 1997.
UST 176	26	25,000-Gallon Aviation Gas, Wastewater Tank	Site Assessment and Remedial Action Report, Tank Farm 2 4/24/1998 and Information Summary	RWQCB 3/27/2000 for Soil and RWQCB 11/8/2007 for Groundwater	UST 176 was constructed in 1943. UST 176 and other tanks at Former Tank Farm 2 (USTs 176 – 183) were removed in 1995 under OCHCA plan check 95-099. Excavation of tanks and piping occurred during August through December 1995. SVE removed approximately 78,000 pounds of petroleum hydrocarbons from the vadose zone at Tank Farm 2 during the period from 1 October 1996 through 11/17/1997. The RWQCB concurred with no further action for the vadose zone in the letter dated 3/27/2000. On 11/8/2007, the RWQCB concurred with no further action for groundwater beneath Former Tank Farm 2 (USTs 176-183 and UST T-5)
UST 177	26	50,000-Gallon Aviation Gas, Wastewater, Fuel Oil Tank	Site Assessment and Remedial Action Report, Tank Farm 2 4/24/1998	RWQCB 3/27/2000 for Soil and RWQCB 11/8/2007 for Groundwater	UST 177 was constructed in 1943. UST 177 and other tanks at Former Tank Farm 2 were removed in 1995 under OCHCA plan check 95-099. Excavation of tanks and piping occurred during August through December 1995. SVE removed approximately 78,000 pounds of petroleum hydrocarbons from the vadose zone at Tank Farm 2 during the period from 10/1/1996 through 11/17/1997. The RWQCB concurred with no further action for the vadose zone in the letter dated 3/27/2000. On 11/8/2007, the RWQCB concurred with no further action for groundwater beneath Former Tank Farm 2 (USTs 176-183 and UST T-5).
UST 178	26	50,000-Gallon Aviation Gas, Wastewater, Fuel Oil Tank	Site Assessment and Remedial Action Report, Tank Farm 2 4/24/1998	RWQCB 3/27/2000 for Soil and RWQCB 11/8/2007 for Groundwater	UST 178 (also known as SWMU/AOC 48) was constructed in 1943. UST 178 and other tanks within the Former Tank Farm 2 were removed in 1995 under OCHCA plan check 95-099. Excavation of tanks and piping occurred during August through December 1995. SVE removed approximately 78,000 pounds of petroleum hydrocarbons from the vadose zone at Tank Farm 2 during the period from 10/1/1996 through 11/17/1997. The RWQCB concurred with no further action for the vadose zone in the letter dated 3/27/2000. On 11/8/2007, the RWQCB concurred with no further action for groundwater beneath Former Tank Farm 2 (USTs 176-183 and UST T-5).

Table 4: Locations of Concern

LOC ID	Building Number/ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes
UST 179	26	25,000-Gallon Aviation Gas, Wastewater, Fuel Oil Tank	Site Assessment and Remedial Action Report, Tank Farm 2 4/24/1998	RWQCB 3/27/2000 for Soil and RWQCB 11/8/2007 for Groundwater	UST 179 (also known as SWMU/AOC 49) was constructed in 1943. UST 179 and other tanks within the Former Tank Farm 2 were removed in 1995 under OCHCA plan check 95-099. Excavation of tanks and piping occurred during August through December 1995. SVE removed approximately 78,000 pounds of petroleum hydrocarbons from the vadose zone at Tank Farm 2 during the period from 10/1/1996 through 11/17/1997. The RWQCB concurred with no further action for the vadose zone in the letter dated 3/27/2000. On 11/8/2007, the RWQCB concurred with no further action for groundwater beneath Former Tank Farm 2 (USTs 176-183 and UST T-5).
UST 180	26	50,000-Gallon Aviation Gas, Wastewater Tank	Site Assessment and Remedial Action Report, Tank Farm 2 4/24/1998	RWQCB 3/27/2000 for Soil and RWQCB 11/8/2007 for Groundwater	UST 180 (also known as SWMU/AOC 51) was constructed in 1943. UST 180 and other tanks within the Former Tank Farm 2 were removed in 1995 under OCHCA plan check 95-099. Excavation of tanks and piping occurred during August through December 1995. SVE removed approximately 78,000 pounds of petroleum hydrocarbons from the vadose zone at Tank Farm 2 during the period from 11/1/1996 through 11/17/1997. The RWQCB concurred with no further action for the vadose zone in the letter dated 27 March 2000. On 8 November 2007, the RWQCB concurred with no further action for groundwater beneath Former Tank Farm 2 (USTs 176-183 and UST T-5).
UST 181	26	50,000-Gallon Aviation Gas, Wastewater, Fuel Oil Tank	Site Assessment and Remedial Action Report, Tank Farm 2 4/24/1998	RWQCB 3/27/2000 for Soil and RWQCB 11/8/2007 for Groundwater	UST 181 was constructed in 1943. UST 181 and other tanks within the Former Tank Farm 2 were removed in 1995 under OCHCA plan check 95-099. Excavation of tanks and piping occurred during August through December 1995. SVE removed approximately 78,000 pounds of petroleum hydrocarbons from the vadose zone at Tank Farm 2 during the period from 10/1/1996 through 11/17/1997. The RWQCB concurred with no further action for the vadose zone in the letter dated 3/27/2000. On 11/8/2007, the RWQCB concurred with no further action for groundwater beneath Former Tank Farm 2 (USTs 176-183 and UST T-5).
UST 182	26	50,000-Gallon Aviation Gas, Wastewater, Fuel Oil Tank	Site Assessment and Remedial Action Report, Tank Farm 2 4/24/1998	RWQCB 3/27/2000 for Soil and RWQCB 11/8/2007 for Groundwater	UST 182 (also known as SWMU/AOC 52) was constructed in 1943. UST 182 and the other tanks within the Former Tank Farm 2 were removed in 1995 under OCHCA plan check 95-099. Excavation of tanks and piping occurred during August through December 1995. SVE removed approximately 78,000 pounds of petroleum hydrocarbons from the vadose zone at Tank Farm 2 during the period from 10/1/1996 through 11/17/1997. The RWQCB concurred with no further action for the vadose zone in the letter dated 3/27/2000. On 11/8/2007, the RWQCB concurred with no further action for groundwater beneath Former Tank Farm 2 (USTs 176-183 and UST T-5).

Table 4: Locations of Concern

LOC ID	Building Number/ Location	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes
UST 183	26	25,000-Gallon Aviation Gas, Wastewater, Fuel Oil Tank	Site Assessment and Remedial Action Report, Tank Farm 2 4/24/1998	RWQCB 3/27/2000 for Soil and RWQCB 11/8/2007 for Groundwater	UST 183 was constructed in 1943. UST 183 and the other tanks within the Former Tank Farm 2 were removed in 1995 under OCHCA plan check 95-099. Excavation of tanks and piping occurred during August through December 1995. SVE removed approximately 78,000 pounds of petroleum hydrocarbons from the vadose zone at Tank Farm 2 during the period from 10/1/1996 through 11/17/1997. The RWQCB concurred with no further action for the vadose zone in the letter dated 3/27/2000. On 11/8/2007, the RWQCB concurred with no further action for groundwater beneath Former Tank Farm 2 (USTs 176-183 and UST T-5).
UST T-5	26	2,000-Gallon Waste JP-5 Tank	Site Assessment/ Closure Report, UST Site T-5 11/4/1997	RWQCB 3/27/2000 for Soil and RWQCB 11/8/2007 for Groundwater	UST T-5, also known as SWMU/AOC 17, was located within the Former Tank Farm 2. UST T-5 was removed on 11/27/1995 and confirmation soil samples were collected under OCHCA plan check 95-099. Additional sampling was conducted during the site assessment of Tank Farm 2. The RWQCB concurred with no further action status on 11/19/1997. On 11/8/2007, the RWQCB concurred with no further action for groundwater beneath Former Tank Farm 2 (USTs 176-183 and UST T-5).

AOC	=	Area of Concern	LQ	=	Liquid	RAD	=	radiological
APHO	=	Aerial Photograph Anomaly	MCAS	=	Marine Corps Air Station	RCRA	=	Resource Conservation and Recovery Act
AST	=	aboveground storage tank	MNA	=	Monitored Natural Attenuation	RI	=	Remedial Investigation
AVGAS	=	aviation gasoline	MPE	=	Multiple Phase Extraction	RD/RA	=	Remedial Design/Remedial Action
BRAC	=	Base Realignment and Closure	MSC	=	miscellaneous	RFA	=	RCRA Facility Assessment
CDHS	=	California Department of Health Services	NA	=	not applicable	ROD	=	Record of Decision
DTSC	=	Department of Toxic Substances Control	N/A	=	not available	RWQCB	=	Regional Water Quality Control Board
EBS	=	Environmental Baseline Survey	NAVFAC Southwest	=	Naval Facilities Engineering Command, Southwest	SAIC	=	Science Applications International Corporation
ECS	=	Enviro Compliance Solutions Inc.	NFA	=	No Further Action	SRU	=	Silver Recovery Unit
EPA	=	Environmental Protection Agency	NFI	=	No Further Investigation	ST	=	Stain
EX	=	Excavation	OCHCA	=	Orange County Health Care Agency	SVE	=	Soil Vapor Extraction
FS	=	Feasibility Study	OHM	=	OHM Remediation Services Inc.	SWMU	=	Solid Waste Management Unit
GW	=	groundwater	OPS	=	Operating Properly and Successfully	TAA	=	Temporary Accumulation Area
HRA	=	historical radiological assessment	OU	=	Operable Unit	UST	=	underground storage tank
ID	=	Identification	OWS	=	oil/water separator	VSI	=	visual site inspection
IRP	=	Installation Restoration Program	PCB	=	polychlorinated biphenyl			
JP-5	=	Jet Propulsion Fuel, Grade 5	ppm	=	part per million			
<	=	less than	PRG	=	preliminary remediation goal			
LOC	=	Location of Concern	PRL	=	Potential release Location			

Table 5: Locations of Concern With On-going Petroleum Corrective Actions

LOC ID	Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes
Carve-Out I-B				
UST 651-1	12,000-Gallon Unleaded Fuel Tank	Summary Report, SVE Operations and Confirmation Sampling Activities 2008	RWQCB 11/4/2008	Tank has been removed. Remediation conducted during 2000. Vadose zone SVE treatment has been completed and closure documentation submitted on 2/26/2008. MNA Evaluation and Long-term Monitoring Plan for groundwater submitted on 5/29/2008. RWQCB concurred with NFA recommendation in a letter dated 11/4/2008. Navy will retain access to the site to allow for ongoing sampling and maintenance of existing groundwater monitoring network.
UST 651-2	12,000-Gallon Unleaded Fuel Tank	Summary Report, SVE Operations and Confirmation Sampling Activities 2008	RWQCB 11/4/2008	Tank has been removed. Remediation conducted during 2000. Vadose zone SVE treatment has been completed and closure documentation submitted on 2/26/2008. MNA Evaluation and Long-term Monitoring Plan for groundwater submitted on 5/29/2008. RWQCB concurred with NFA recommendation in a letter dated 11/4/2008. Navy will retain access to the site to allow for ongoing sampling and maintenance of existing groundwater monitoring network.
UST 651-3	12,000-Gallon Unleaded Fuel Tank	Summary Report, SVE Operations and Confirmation Sampling Activities 2008	RWQCB 11/4/2008	Tank has been removed. Remediation conducted during 2000. Vadose zone SVE treatment has been completed and closure documentation submitted on 2/26/2008. MNA Evaluation and Long-term Monitoring Plan for groundwater submitted on 5/29/2008. RWQCB concurred with NFA recommendation in a letter dated 11/4/2008. Navy will retain access to the site to allow for ongoing sampling and maintenance of existing groundwater monitoring network.
UST 651-4	12,000-Gallon Unleaded Fuel Tank	Summary Report, SVE Operations and Confirmation Sampling Activities 2008	RWQCB 11/4/2008	Tank has been removed. Remediation conducted during 2000. Vadose zone SVE treatment has been completed and closure documentation submitted on 2/26/2008. MNA Evaluation and Long-term Monitoring Plan for groundwater submitted on 5/29/2008. RWQCB concurred with NFA recommendation in a letter dated 11/4/2008. Navy will retain access to the site to allow for ongoing sampling and maintenance of existing groundwater monitoring network.
Carve-Out I-M				
UST 65A	1,400-Gallon Fuel Oil Tank	N/A	N/A	Tank Removal completed on 7/19/1997. Site is under investigation. Further action on going.

Table 5: Locations of Concern With On-going Petroleum Corrective Actions

LOC ID		Description	Closure Report Title/Date	NFA Letter Agency/Date	Notes
ID	=	Identification			
LOC	=	Locations of Concern			
MNA	=	Monitored Natural Attenuation			
N/A	=	not available			
NFA	=	No Further Action			
RWQCB	=	Regional Water Quality Control Board			
SVE	=	Soil Vapor Extraction			
UST	=	underground storage tank			

Table 6: Summary of Asbestos Surveys

Carve-Out ID	Building Number	Description	Square Feet	Year Built	Historical Asbestos Survey Information	Comments
I-B	439	Branch Medical/Dental Clinic	70,167	1959	IT Corp (1989): Transite, vibration dampener, pipe insulation, duct insulation. Pipe insulation & mastic, cement panels (assumed), pipe elbows, floor tile & mastic, stucco, boiler insulation, duct connector. On 8/1/2000 - 8/3/2000: FAD debris at sink room 138 (168 on floor plan). FAD in basement mechanical rooms. FAD in stairwell, 2nd floor. Suspect FAD wall plaster and surfacing rooms 212 & 214 (236 & 238 on floor plan). Suspect damaged above drop ceiling in hallway outside room 232 (256 on floor plan).	FAD ACM found.
I-G	7	Storage	10,370	1943	IT Corp (1989): No ACM Found	No ACM found
II-I	308	Ground Support Equipment Shop	720	1944	IT Corp (1989): Floor tile	Non-FAD ACM found; not surveyed since 1997.
II-I	392	Air Craft Ground Support Equipment Shop	6,400	1955	IT Corp (1989): Duct insulation, pipe insulation	FAD ACM found
II-I	764	Vehicle Washrack Utility Building	228	1984	Not Surveyed	Not Surveyed
II-P	637	Exchange Gas Station	Unknown	<1973	Not Surveyed	Not Surveyed
III-D	26	Communications Shop	6,240	1943	IT Corp (1989): No ACM Found	No ACM found

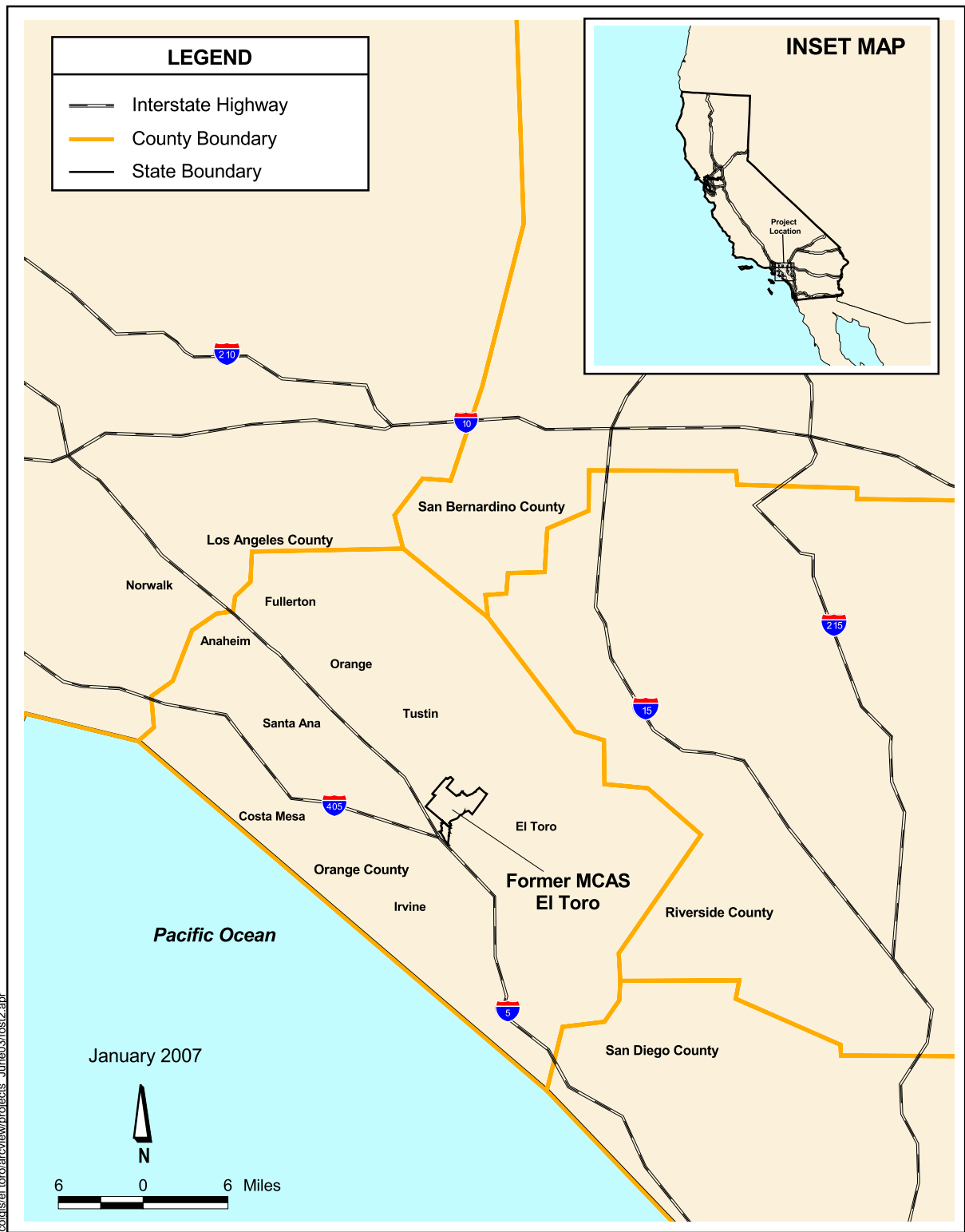
< = before
 ACM = asbestos-containing material
 FAD = friable, accessible, and damaged
 ID = Identification

Table 7: Monitoring/Bioventing/SVE Wells

Carve Out	Well ID
I-B	651 MW-01
I-B	651 MW-02
I-B	651 MW-03
I-B	651 MW-04
I-B	651 MW-05
I-B	651 MW-06
I-B	651 ROI -1
I-B	651 ROI -2
I-B	651 ROI -3
I-B	651 SVE 1A
I-B	651 SVE 1C
I-B	651 SVE 2B
I-B	651 SVE 2D
I-B	651 SVE 3
I-B	651 SVE 4A
I-B	651 SVE 4D
I-B	651 SVE 5
I-B	651 SVE 6
I-B	651 SVE 7

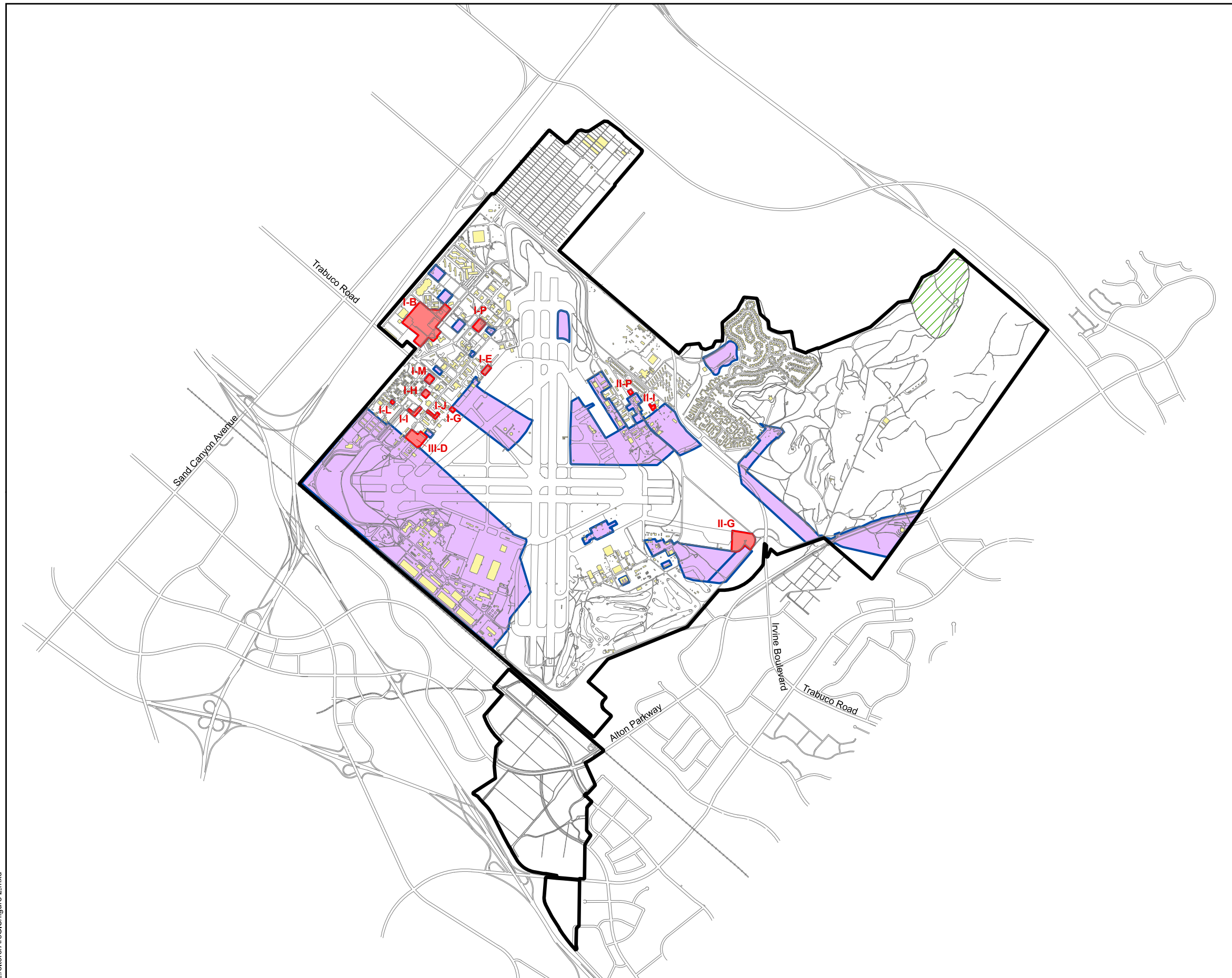
ID = Identification
MW = Monitoring Well
ROI = Radius of Influence
SVE = Soil Vapor Extraction

Figures



**VICINITY MAP
FORMER MCAS EL TORO
CALIFORNIA**

**Figure
1**



LEGEND

- Property Boundary
- Roads
- Leased Areas (Carve-Outs)
- Transferred Areas
- Carve-Out Areas (FOST #4)
- Building/Facility
- Non-leased Navy Property
- II-G Carve-Out Number (FOST #4)

SOURCE

Final Environmental Baseline Survey,
Former Marine Corps Air Station
El Toro, California. Earth Tech 2003.

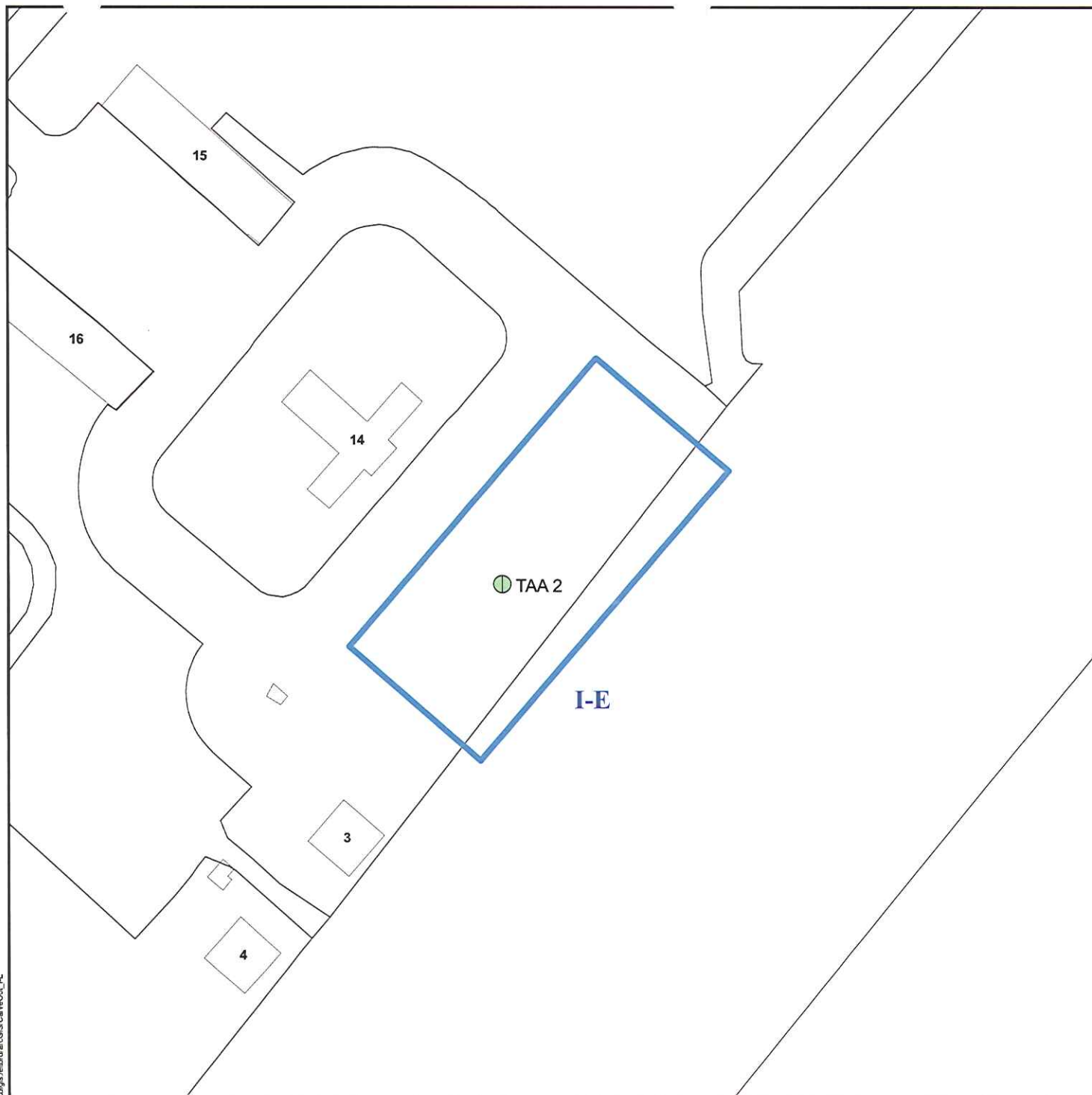
Final

January 2009



3,250 1,625 0 3,250 Feet

Figure 2
Carve-Out Area Location Map
Finding of Suitability
to Transfer (FOST #4)
Former MCAS El Toro, California



LEGEND

- Roads
- Buildings
- Carve-Out Area (FOST #4)
- Carve-Out Number (FOST #4)
- Temporary Accumulation Area (TAA)

SOURCE

Final Environmental Baseline Survey,
Former Marine Corps Air Station
El Toro, California. Earth Tech 2003.



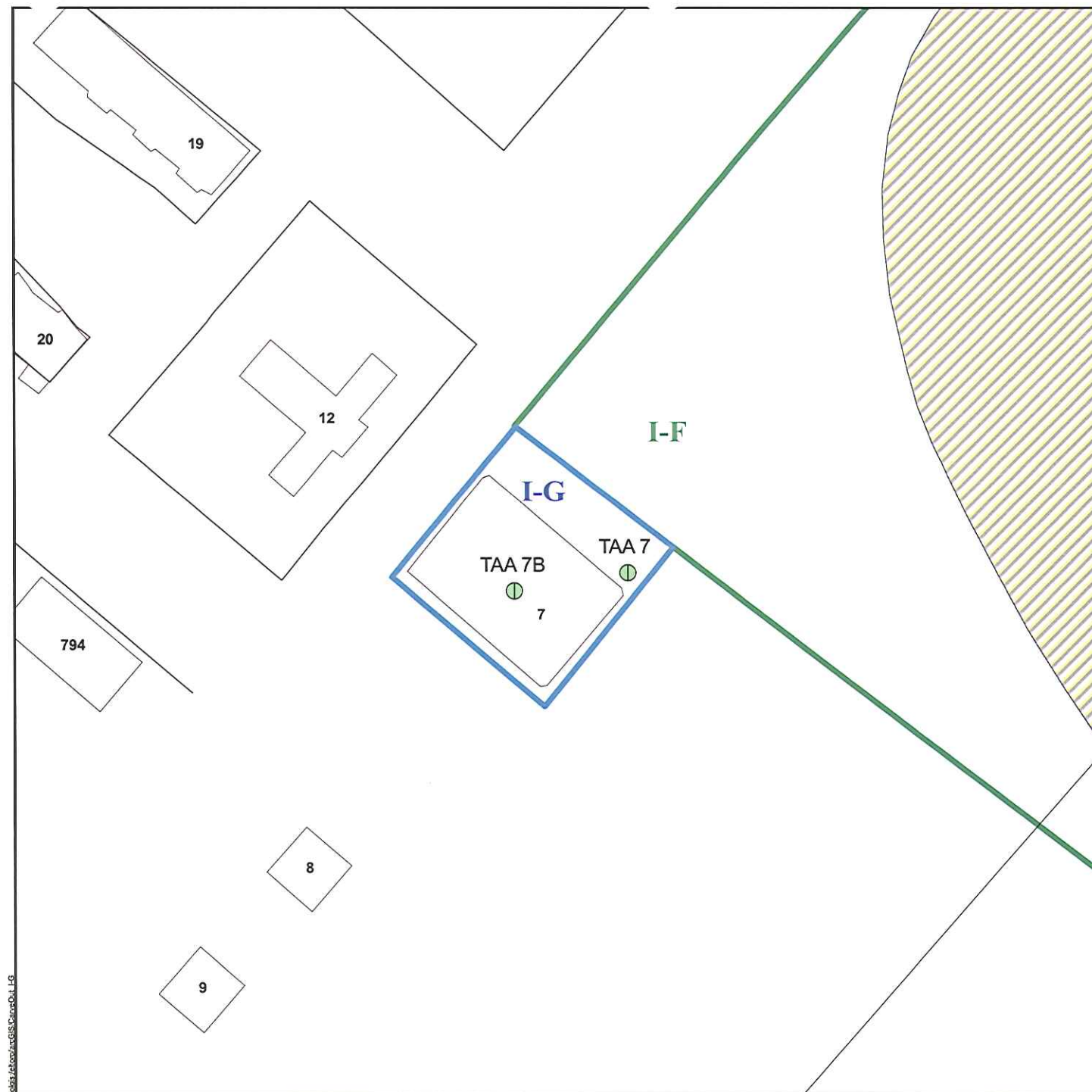
Final

January 2009



0 25 50 100 Feet

Figure 4
Carve-Out I-E
Finding of Suitability
to Transfer (FOST #4)
Former MCAS El Toro, California



LEGEND

- ~ Roads
- Buildings
- I-G Carve-Out Area (FOST #4)
- I-G Carve-Out Number (FOST #4)
- I-F Adjacent Property Carve Out Area
- ⊙ Temporary Accumulation Area (TAA)
- ▨ IRP 16 Groundwater Plume Buffer Zone

SOURCE

Final Environmental Baseline Survey,
Former Marine Corps Air Station
El Toro, California. Earth Tech 2003.



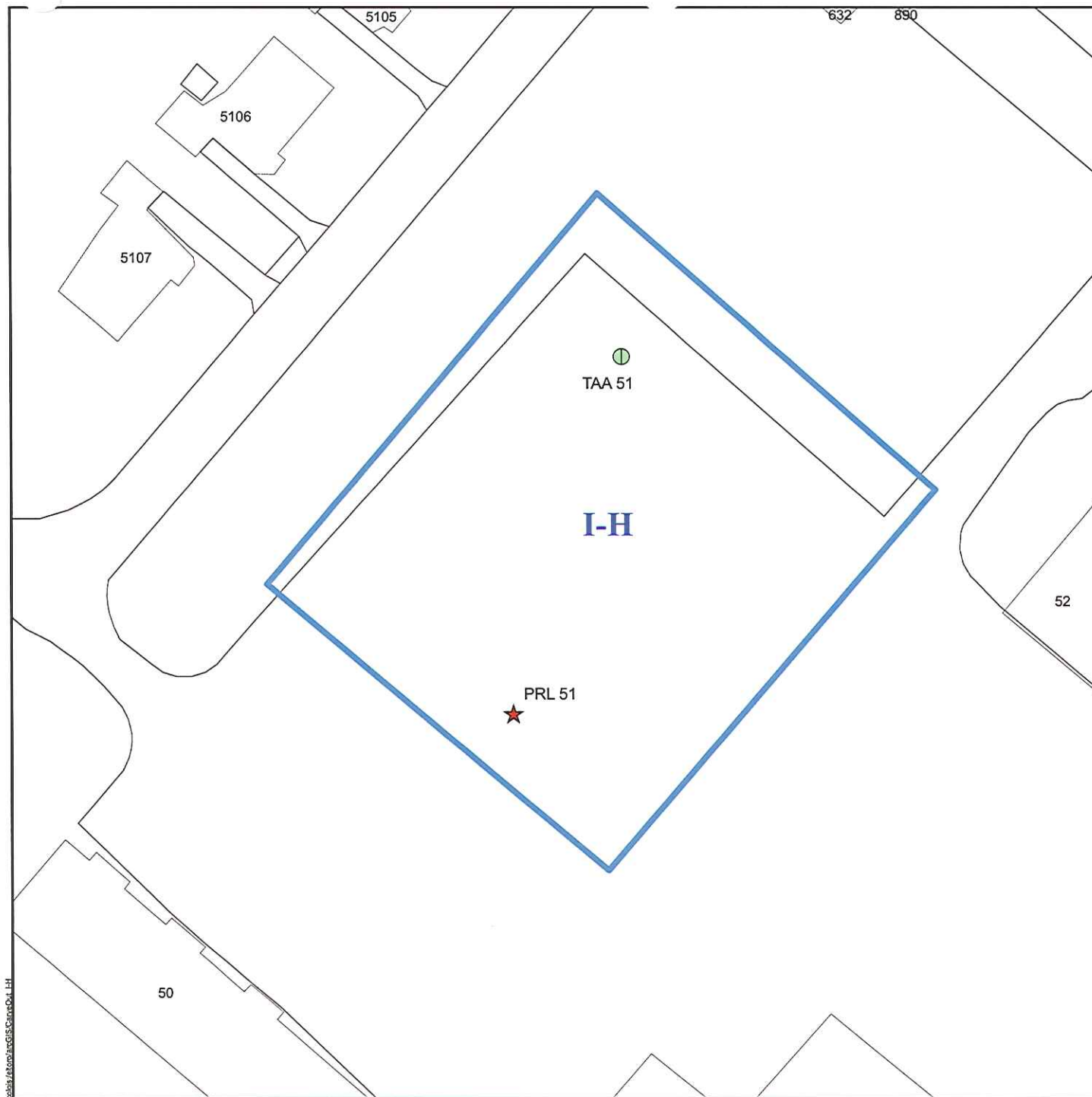
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January 2009



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Figure 5
Carve-Out I-G
Finding of Suitability
to Transfer (FOST #4)
Former MCAS El Toro, California



\\fs03\el_toro\GIS\CarveOut_I-H

LEGEND	
	Roads
	Buildings
	Carve-Out Area (FOST #4)
	Carve-Out Number (FOST #4)
	Temporary Accumulation Area (TAA)
	Potential Release Location (PRL)

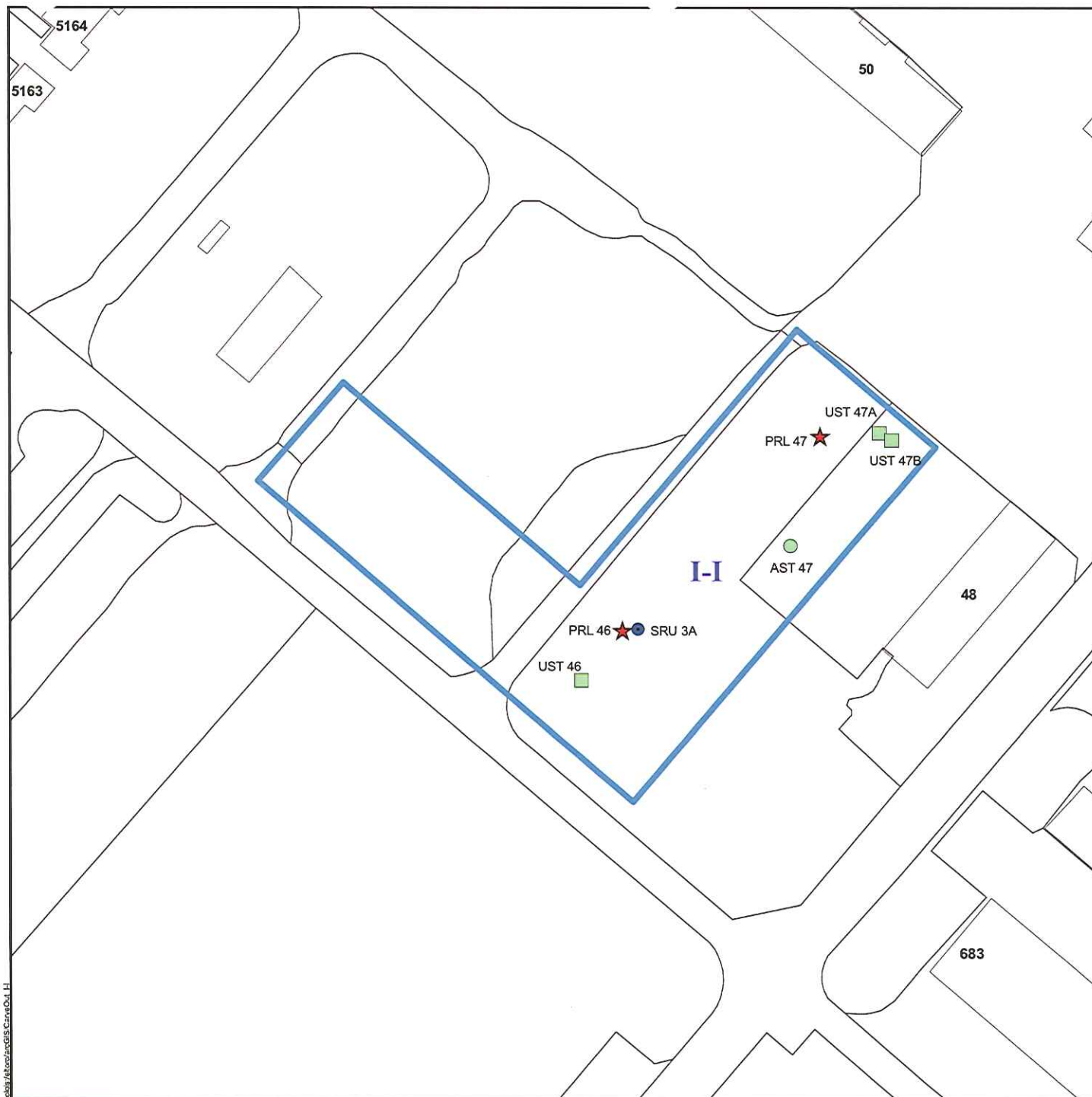
SOURCE
Final Environmental Baseline Survey, Former Marine Corps Air Station El Toro, California. Earth Tech 2003.



Final

January 2009

Figure 6
Carve-Out I-H
Finding of Suitability
to Transfer (FOST #4)
Former MCAS El Toro, California



LEGEND

- Roads
- Buildings
- Carve-Out Area (FOST #4)
- Carve-Out Number (FOST #4)
- Underground Storage Tank (UST)
- Aboveground Storage Tank (AST)
- Potential Release Location (PRL)
- Silver Recovery Unit (SRU)

SOURCE

Final Environmental Baseline Survey,
Former Marine Corps Air Station
El Toro, California. Earth Tech 2003.



Final

January 2009



0 40 80 160 Feet

Figure 7
Carve-Out I-I
Finding of Suitability
to Transfer (FOST #4)
Former MCAS El Toro, California



c:\data\el_toro\GIS\CarveOut_I-J

LEGEND

- Roads
- Buildings
- Carve-Out Area (FOST #4)
- Carve-Out Number (FOST #4)
- Temporary Accumulation Area (TAA)
- Potential Release Location (PRL)

SOURCE

Final Environmental Baseline Survey,
Former Marine Corps Air Station
El Toro, California. Earth Tech 2003.

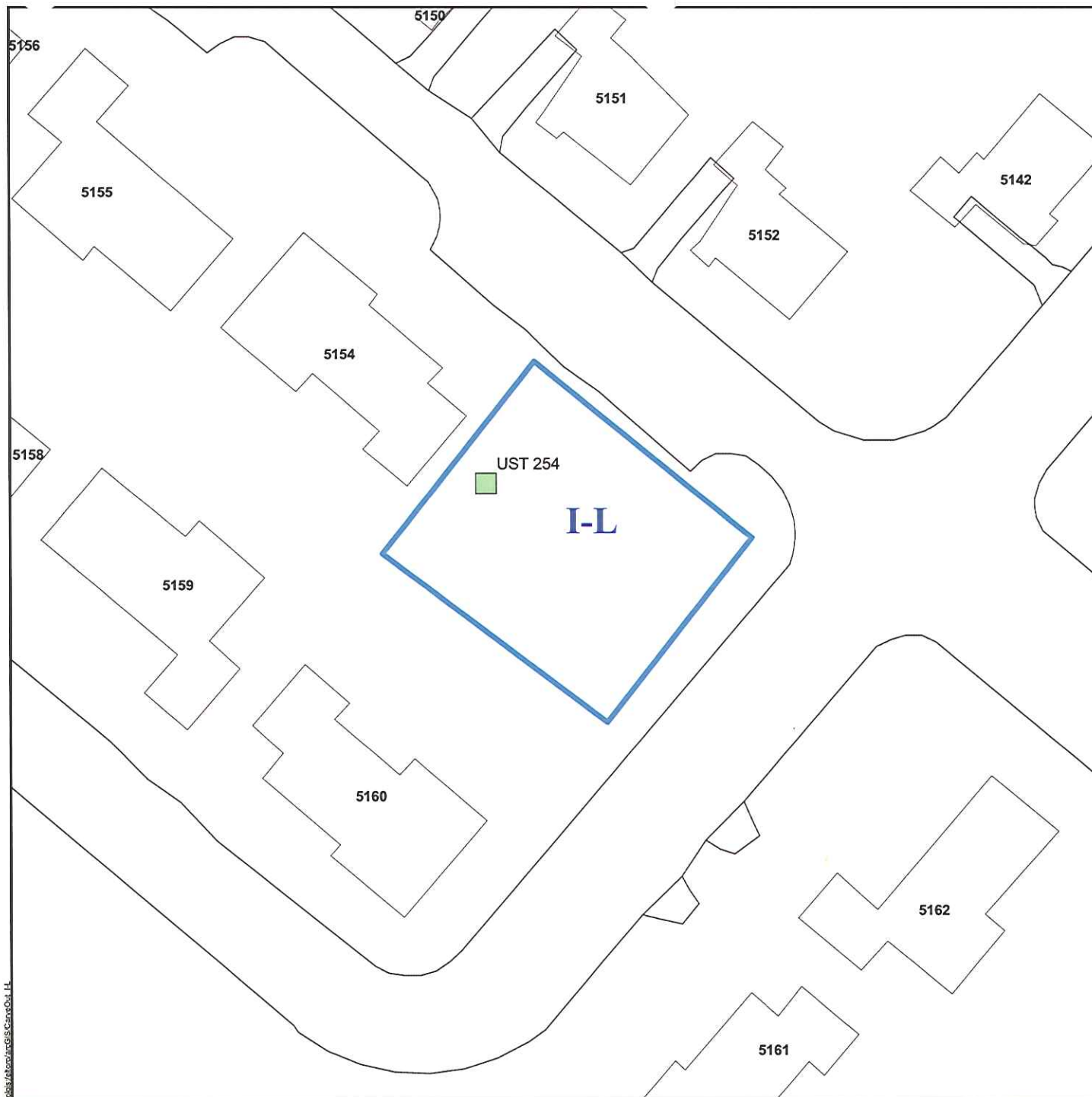


Final

January 2009

0 25 50 100 Feet

Figure 8
Carve-Out I-J
Finding of Suitability
to Transfer (FOST #4)
Former MCAS El Toro, California



LEGEND

- Roads
- Buildings
- Carve-Out Area (FOST #4)
- Carve-Out Number (FOST #4)
- Underground Storage Tank (UST)

SOURCE

Final Environmental Baseline Survey,
Former Marine Corps Air Station
El Toro, California. Earth Tech 2003.



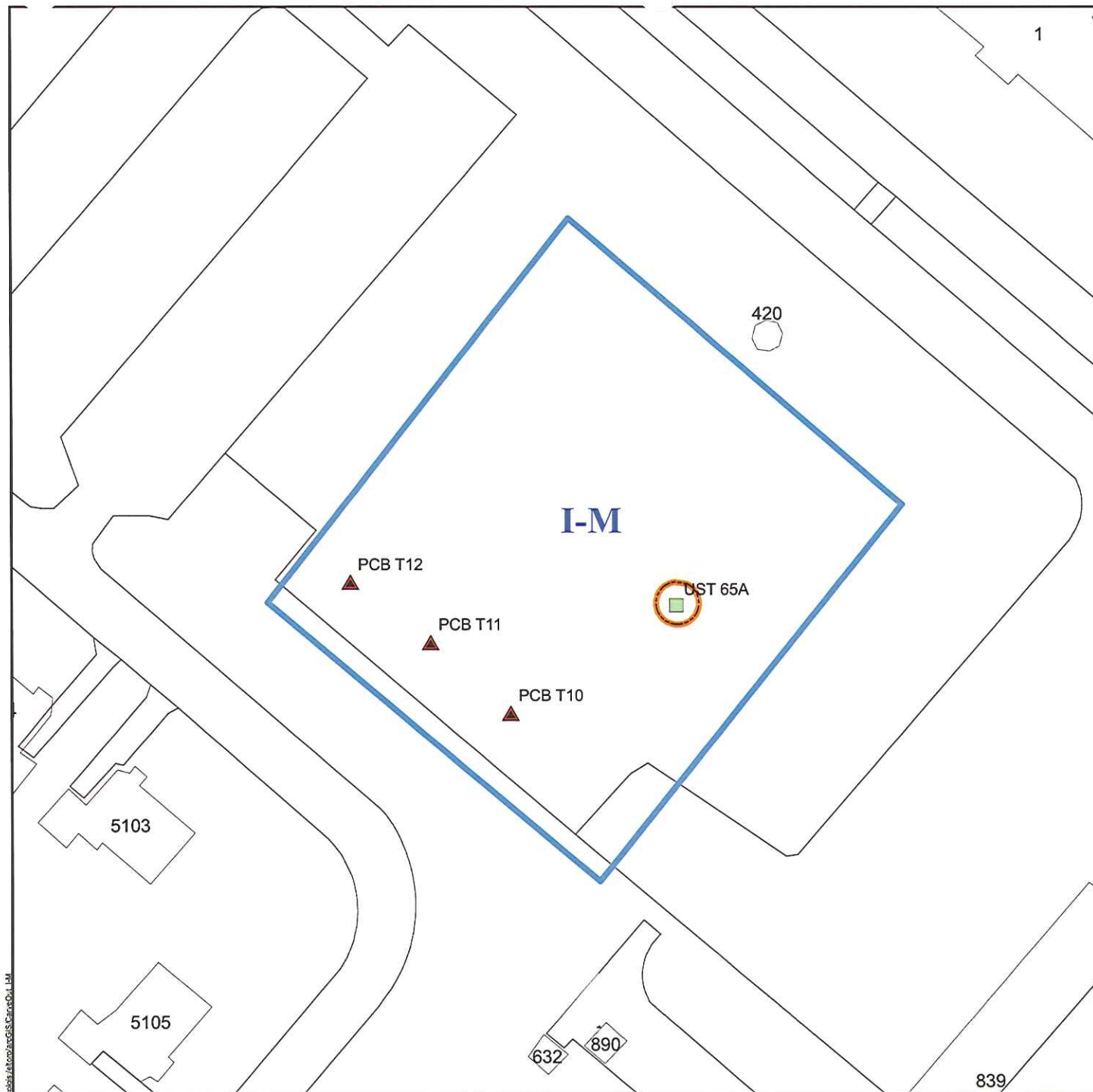
Final

January 2009



0 20 40 80 Feet

Figure 9
Carve-Out I-L
Finding of Suitability
to Transfer (FOST #4)
Former MCAS El Toro, California



LEGEND

- Roads
- Buildings
- Carve-Out Area (FOST #4)
- Carve-Out Number (FOST #4)
- No Dig Area for On-Going Petroleum Corrective Action
- PCB Transformer/Equipment
- Underground Storage Tank (UST)

SOURCE

Final Environmental Baseline Survey,
Former Marine Corps Air Station
El Toro, California. Earth Tech 2003.



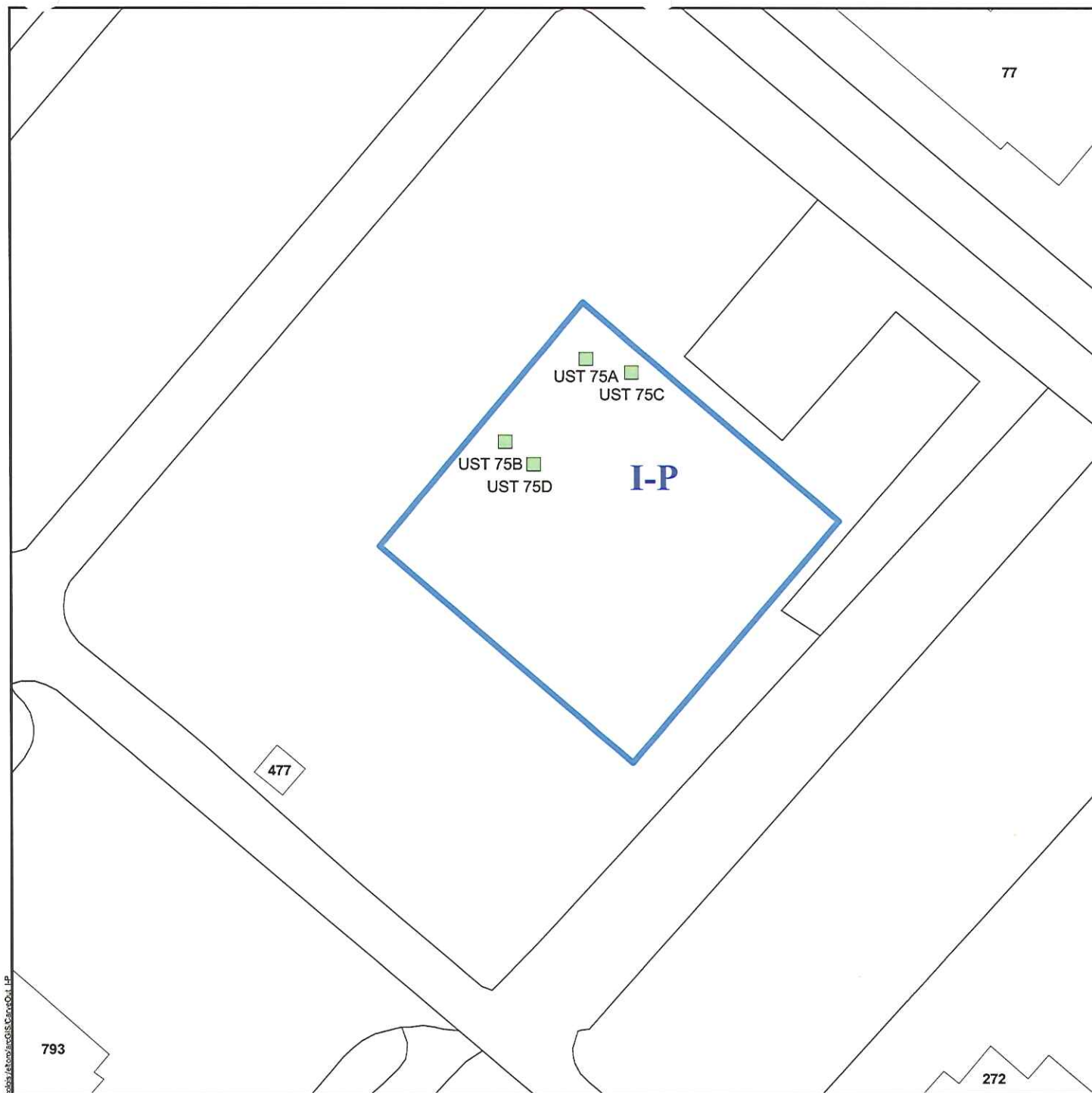
Final

January 2009



0 25 50 100 Feet

Figure 10
Carve-Out I-M
Finding of Suitability
to Transfer (FOST #4)
Former MCAS El Toro, California



LEGEND

-  Roads
-  Buildings
-  Carve-Out Area (FOST #4)
-  Carve-Out Number (FOST #4)
-  Underground Storage Tank (UST)

SOURCE

Final Environmental Baseline Survey,
Former Marine Corps Air Station
El Toro, California. Earth Tech 2003.



Final

January 2009



0 20 40 80 Feet

Figure 11
Carve-Out I-P
Finding of Suitability
to Transfer (FOST #4)
Former MCAS El Toro, California



LEGEND

- Roads
- Buildings
- II-G Carve-Out Area (FOST #4)
- IRP Site
- II-H Adjacent Property Carve Out Area
- II-G Carve-Out Number (FOST #4)
- APHO 118 Aerial Photograph Anomaly Area (APHO) Site
- Landfill Buffer Zone
- Skeet Range Buffer Zone

SOURCE

Final Environmental Baseline Survey,
Former Marine Corps Air Station,
El Toro, California. Earth Tech 2003.



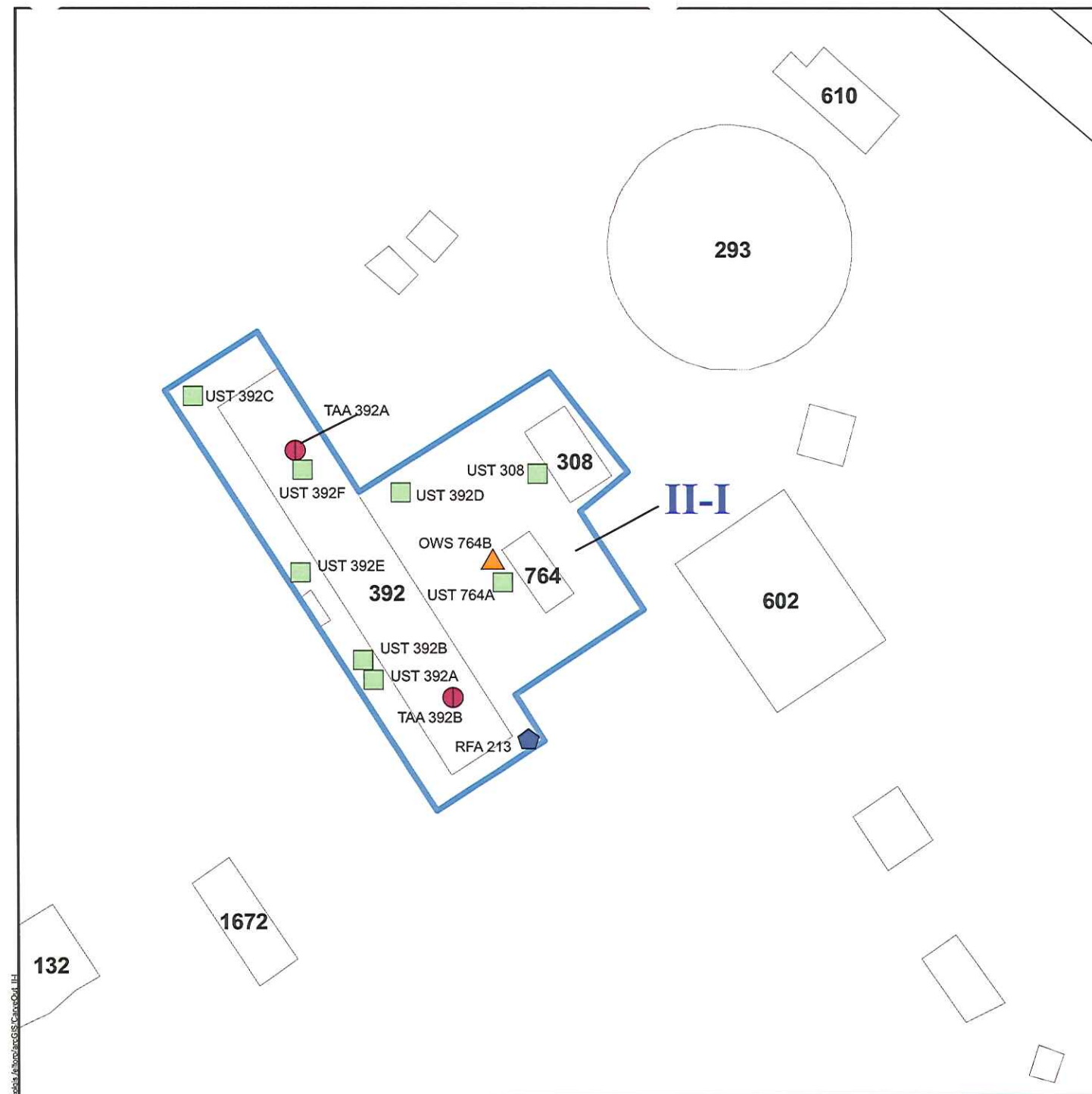
Final

January 2009



0 80 160 320 Feet

Figure 12
Carve-Out II-G
Finding of Suitability
to Transfer (FOST #4)
Former MCAS El Toro, California



LEGEND

- Roads
- Buildings
- Carve-Out Area (FOST #4)
- Carve-Out Number (FOST #4)
- Temporary Accumulation Area (TAA)
- Oil Water Separator (OWS)
- Underground Storage Tank (UST)
- RCRA Facility Assessment (RFA) Site

SOURCE

Final Environmental Baseline Survey,
Former Marine Corps Air Station
El Toro, California. Earth Tech 2003.

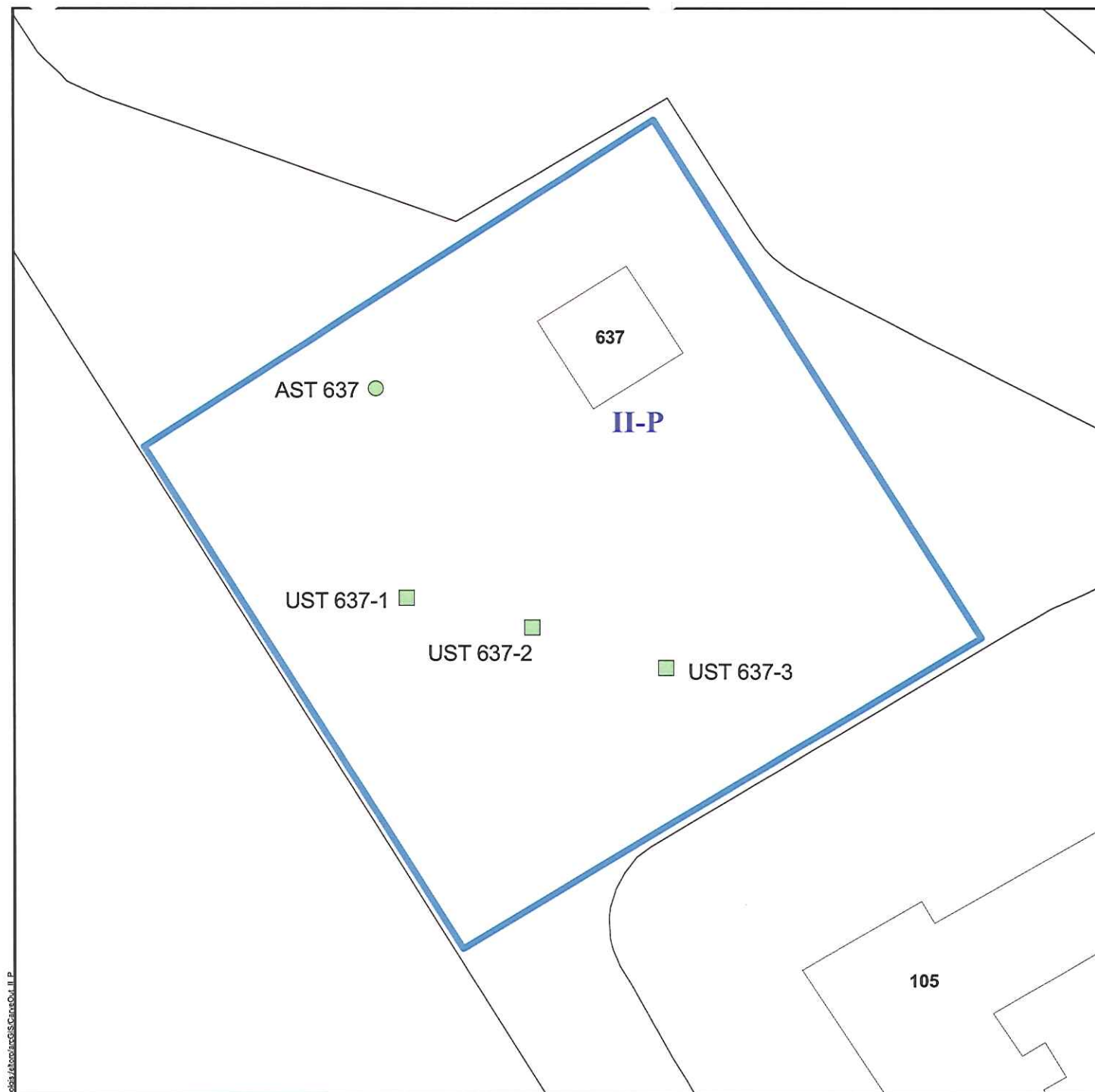


Final
January 2009



0 25 50 100 Feet

Figure 13
Carve-Out II-I
Finding of Suitability
to Transfer (FOST #4)
Former MCAS El Toro, California



LEGEND

- Roads
- Buildings
- II-P Carve-Out Area (FOST #4)
- II-P Carve-Out Number (FOST #4)
- Underground Storage Tank (UST)
- Aboveground Storage Tank (AST)

SOURCE

Final Environmental Baseline Survey,
Former Marine Corps Air Station
El Toro, California. Earth Tech 2003.



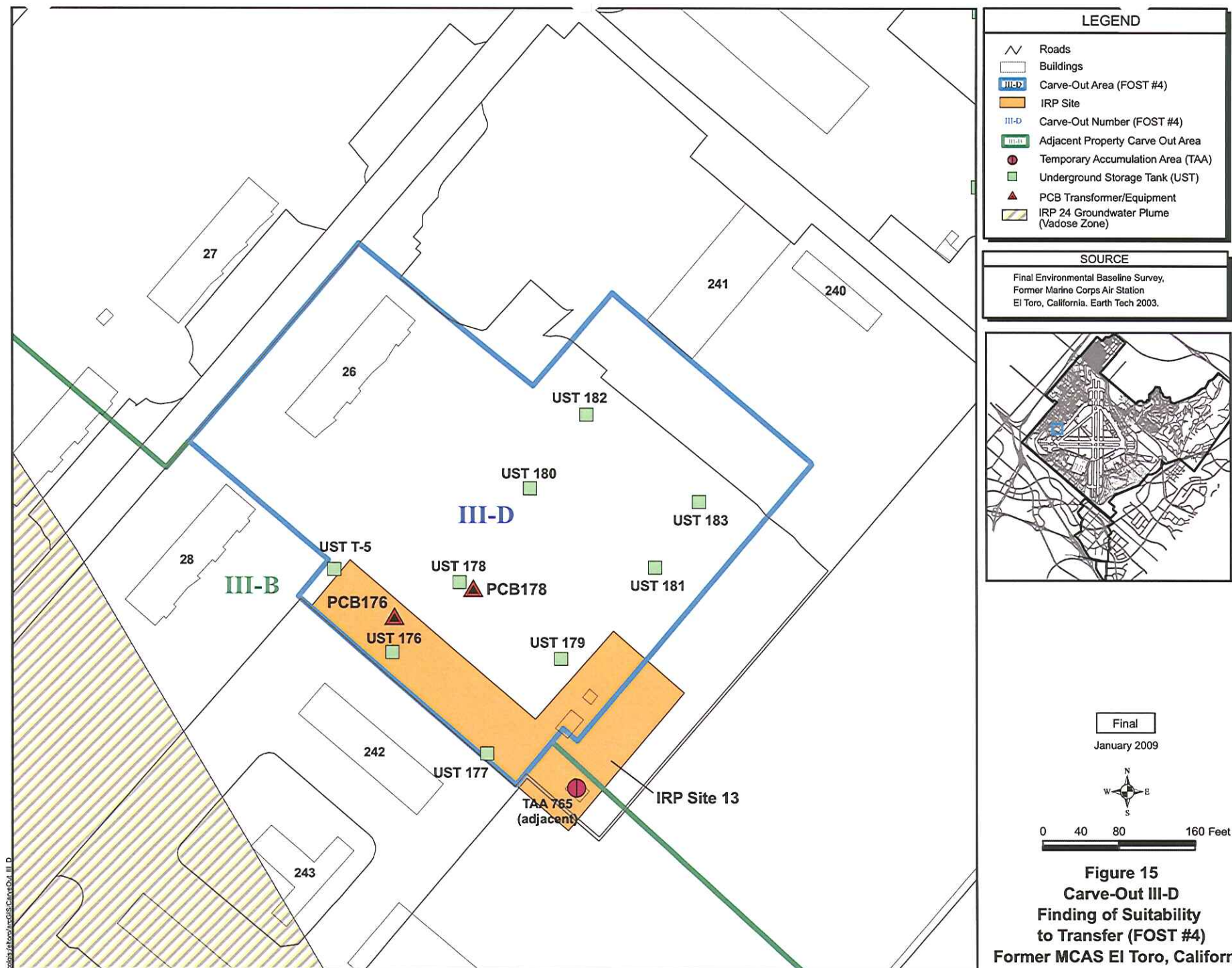
Final

January 2009



0 15 30 60 Feet

Figure 14
Carve-Out II-P
Finding of Suitability
to Transfer (FOST #4)
Former MCAS El Toro, California



Attachment 1
Comment/Response to Comments

No comments from the public or any other interested parties were received on the Draft Final FOST#4 during the 45-day public comment period from November 22, 2008 through January 6, 2009.

Document Titles:

Draft Finding of Suitability to Transfer #4, (Carve-Outs I-B, I-E, I-G, I-H, I-I, I-J, I-L, I-M, I-P, II-G, II-I, II-P, and III-D) Former Marine Corps Air Station, El Toro, CA, August 2008

Reviewer: Rich Muza, United States Environmental Protection Agency, Region IX, Dated: September 22, 2008

Comment No.	Section/ Page No.	Comment	Response
1.	General	<p>The FOST does not address the following topics that are commonly covered in these property transfer documents: intended reuse of the carve-outs, proposed transferee for each carve-out, summary of NEPA issues, EBS category for carve-outs, and a listing of all detected contaminants. In particular, the absence of information regarding the intended re-use of the carve-outs is problematic as this information would have assisted EPA in determining what restrictions would be appropriate. For instance, Section 5.1.1, Carve-Out I-B states that there is a petroleum plume in this area. The Navy lists the restrictions on the next page; however, it is not clear from these restrictions whether buildings, if any, will be built on this property. If so, what kind? Residential? Industrial? The Base Redevelopment and Realignment Manual (BRRM), which is the current guidance for FOSTs being developed for the former MCAS El Toro, does not prohibit the information listed above from being provided to the regulators. Therefore, EPA recommends that the listed information be provided in the draft final submittal.</p>	<p>The inclusion of a description of the intended reuse was formerly a requirement of BRIM. The BRIM guidance has been superseded with new 2006 BRRM guidance. This FOST#4 was prepared under the new BRMM guidance which does not require the inclusion of a description of the intended reuse of the carve-outs, summary of NEPA issues, and EBS category for carve-outs. The EBS categories are no longer in use.</p> <p>With respect to reuse, as discussed in previous concurred upon FOSTs, the Navy is not disposing of the property in connection with any particular reuse or redevelopment plan, and anticipates that reuse will ultimately be determined by local zoning applicable at the time of sale.</p> <p>With respect to contaminants, this FOST contains the same level of detail as previous concurred upon FOSTs. As noted in Section 4, a notice of hazardous substances and petroleum products stored, released, or disposed at specific sites within the COs proposed for transfer are listed in Attachments 4a and 4b – Hazardous Substances Notification and Petroleum Products Notification tables. Additionally, FOST Tables 3 and 4, provide detailed environmental information pertaining to potential release locations and locations of concern within specific COs.</p> <p>Based on the information contained in this FOST and the notices, restrictions and covenants that will be contained in the deed the FOST 4 COs are suitable for transfer.</p> <p>Therefore, no changes to format and text of the FOST#4 is required.</p>

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Reviewer: Rich Muza, United States Environmental Protection Agency, Region IX, Dated: September 22, 2008

Comment No.	Section/ Page No.	Comment	Response
2.	Page 12	For carve-out I-G, there is a statement that the groundwater is in the final stages of remediation and therefore poses no threat. What is meant by the phrase "in the final stages of remediation"? Does this mean that the pump and treat system is operating properly and successfully or that the plume has shrunk and the cleanup goal is close to being achieved? The statement here is vague and it is hard to assess whether in fact EPA can agree that there is no threat to future users of the property adjacent to the plume. In contrast, for carve-out III-D (also on this page), there is a statement that although there is a plume, this plume is approximately 100 feet below the land surface and therefore poses no threat to the future use of the adjacent carve out property. Based on this more specific statement, EPA can agree that there is no threat to human health despite the presence of the plume. It is recommended that further information be provided for carve-out I-G.	<p>The discussion for Carve-out I-G adjacent property has been revised as follows:</p> <p>6.2 CARVE-OUT I-G (FIGURE 5)</p> <p>This CO adjoins CO I-F which contains groundwater that contains VOC contaminants. A 300-foot buffer zone around the maximum predicted extent of the groundwater plume, as indicated by the groundwater model, is designed to prevent construction of groundwater extraction wells that could cause the plume to migrate and impact the cleanup remedy. Because CO I-G is outside the 300-foot buffer zone and remedial actions are underway for the Site 16 groundwater plume, no impact to CO I-G is anticipated.</p>

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Reviewer: Quang Than, Department of Toxic Substances Control, Dated: September 12, 2008

Comment No.	Section/ Page No.	Comment	Response
1.	General	The Department of Toxic Substances Control (DTSC) received a letter from the Navy dated August 25, 2008 requesting DTSC to make a corrective action complete determination (CACD) for the 13 carve-outs (COs) covered in Finding of Suitability to Transfer (FOST) #4. DTSC is discussing the Navy's request internally. DTSC has not yet proposed to make a CACD for the FOST #4 COs and any discussion of such a determination in this FOST is premature.	Text will be revised for consistency per conversations with DTSC post receipt of the August 25, 2008 letter from the Navy.
2.	General	The notifications and restrictions are presented much differently in FOST #4 compared to the July 2004 FOST (FOST #1) and FOST #2. FOST #3 contained notifications only, there were no restrictions. DTSC's preference is the format used in FOSTs #1 and #2, where there is one section that lists each of the environmental factors and their applicable notifications and restrictions, rather than having the notifications and restrictions in separate sections. The Base Redevelopment and Realignment Manual (BRRM) FOST outline also includes the notifications and restrictions, as well as the analysis of the environmental impacts caused by adjacent property conditions, in the same section titled "Summary of Environmental Condition and Notifications". The environmental factors listed in this section should also be consistent with those environmental factors used in Table 1, which are consistent with the BRRM FOST outline. DTSC suggests that FOST #4 be reformatted to look more like FOSTs #1 and #2 and the BRRM FOST outline.	Refinements to the format were made to take into consideration BRRM guidance, DoD guidance and site specific factors, including previous FOST formats. As noted in the BRRM guidance, summaries need only be provided for topics checked "yes" in guidance Table 1.
3.	General	Potential Release Location (PRL) 22, located in CO I-J was included in the July 2004 Finding of Suitability to Lease (FOSL). What is the status of PRL 22 and why is it not included in this FOST?	PRL 22 was evaluated within the Group I PRL Investigations. DTSC and EPA concurred with the NFA recommendation for PRL 22 in letters dated 7/13/2005 and 4/7/2005, respectively. The text and tables have been updated to reflect the existence and closure of PRL 22.

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Reviewer: Quang Than, Department of Toxic Substances Control, Dated: September 12, 2008

Comment No.	Section/ Page No.	Comment	Response
4.	General	There is a "Monitoring/Bioventing/SVE Wells" notification and restriction in the FOSL for COs I-B and III-D. Please ensure that the notification and restriction are carried over to this FOST, if applicable.	The "Monitoring/Bioventing/SVE Wells" restrictions for CO I-B are noted in section 5, Summary of Restrictions, on page 8. As noted in section 4.2.8, CO III-D has received site closure concurrence for the vadose zone soil and groundwater. Therefore, all wells have been removed.
5.	General	A notification for radon was included in the FOSL. Why is the same notification not included in this FOST?	Text has been revised to include a radon notification in Section 4.
1.	Section 1	Section 1 (Purpose): Please include a paragraph that provides information about the El Toro Administrative Record File and Information Repository. In a separate paragraph, please include information regarding how the public can access records supporting the Regional Water Quality Control Board (RWQCB) and the Orange County Health Care Agency (OCHCA) cleanup and corrective action decisions for underground storage tanks (USTs) and aboveground storage tanks (ASTs) relied upon in this FOST. See page 1-2 of FOST #1 for sample paragraphs. For purposes of continuity, please explain that the FOST #4 COs were originally part of the FOSL because they needed additional investigation and/or action prior to being found suitable for transfer.	Based on the BRRM content and formatting guidance, this information will not be included in the FOST. The El Toro Administrative Record File, and the Information Repository contact information, is available in the newspaper public notice, and the Notice of Proposed Corrective Action Complete Determination. Both of these documents are distributed to the public, and included in the final FOST. Regarding the addition of contact information of the Regional Water Quality Control Board and the Orange County Health Care Agency, one purpose of the BRRM guidance is avoid repeating information this is available through other sources. Contact information for these agencies is at locations other than this FOST. Information that carve-outs were retained is presently on the "Purpose" section.
2.	Section 2	Section 2 (Property Description), Bullet 1: CO I-B is said to consist of approximately 22.9 acres, however, the Navy's letter requesting a CACD for the FOST #4 COs lists CO I-B as consisting of approximately 22.6 acres. Please correct the FOST if necessary.	The area of CO I-B is approximately 22.9 acres.

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Reviewer: Quang Than, Department of Toxic Substances Control, Dated: September 12, 2008

Comment No.	Section/ Page No.	Comment	Response
3.	Section 3.1	Section 3.1 (Resource Conservation and Recovery Act Part B Permit and Subtitle C Corrective Action), Paragraph 2: Please change the last three lines to read, "determination under Section 120(h) of CERCLA that all remedial action necessary to protect human health and the environment with respect to any such substance remaining on the property has been taken and a determination that all necessary RCRA Subtitle C corrective action has been completed."	Text has been revised accordingly.
4.	Section 3.1	Section 3.1 (Resource Conservation and Recovery Act Part B Permit and Subtitle C Corrective Action), Last Paragraph: Please note that DTSC has not proposed a Resource Conservation and Recovery Act (RCRA) CACD for ten COs. The statement that the three remaining COs would receive RCRA CACDs consistent with restrictions in FOST Section 5.0 and a California Environmental Quality Act (CEQA) Notice of Exemption is also premature. Please note that it is DTSC that would make such determinations if appropriate. (See General Comment #1 above)	See response to General comment #1 above.
5.	Section 3.3	Section 3.3 (Comprehensive Environmental Response, Compensation, and Liability Act): See General Comment #2 above. Please delete this section and incorporate the information into Section 4 (Summary of Environmental Conditions and Notifications).	See response to General comment #2 above.
6.	Section 4	Section 4 (Summary of Environmental Conditions and Notifications), Paragraph 3: DTSC recently issued no further investigation (NFI) concurrence for PRLs COs I-B-439 and CO I-I-46. Please update the paragraph and the references.	The FOST text and references have been up-dated to reflect DTSC's NFA concurrence for PRLs 439 and 46.
7.	Section 4.1.5	Section 4.1.5 (Carve-Out I-I (Figure 7)): To maintain consistency with page 4 and Table 4 (see Specific Comments 7 and 31), please change the citation to show "(EPA 2008 and DTSC 2008)".	The citation has been changed.

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Comment No.	Section/ Page No.	Comment	Response
8.	Section 4.1.9	Section 4.1.9 (Carve-Out III-D): This section refers to a record of decision (ROD) for NFA for Site 13 signed on September 30, 1997. This ROD states that Site 13 overlies contaminated groundwater and use restrictions are required. The FOST should describe these ROD requirements for use restrictions and explain how the requirements are being met.	The selected remedy in the ROD signed on 30 September 1997, for Site 13 was no action. No deed restrictions were recommended for Site 13 due to chemicals present in the soil. However since the groundwater beneath Site 13 was contaminated by trichloroethylene (TCE) and tetrachloroethylene (PCE) due to Site 24 VOC source area, when the NFA ROD was signed in 1997, the use restrictions prohibiting drilling of wells and/or extraction of groundwater and allowing access for groundwater monitoring and maintenance of equipment associated with groundwater remediation were to be addressed in the ROD for OU-1 Site 18 and OU-2A Site 24 (DON 1997). When the Final ROD for OU-1 Site 18 and OU-2A Site 24 was completed in 2002 (DON 2002b), the updated VOC plume and 500 foot buffer zone were no longer located beneath Site 13. Consequently, groundwater restrictions due to the Site 24 VOC plume are no longer applicable for Site 13. This information was taken from section 4.1.3.10 of the FOSL of July 2004.
9.	Section 4.2	Section 4.2 (Petroleum Products and Derivatives): This section states that DTSC has determined that investigations and cleanups on eight COs have satisfied the corrective action requirements of RCRA and state law. This statement is premature as DTSC has not made such a determination. (See General Comment #1 above)	See specific response #1 above.
10.	Section 4.2.7	Section 4.2.7: This section cites to Earth Tech 2003 as the source of site closure concurrence for petroleum AST 637. Please correct to show the regulatory agency confirming this concurrence.	AST 637 was a propane tank that was closed as part of concurrence with 2003 EBS. References to DTSC and EPA concurrence of the 2003 EBS have been included.
11.	Section 4.4	Section 4.4 (Lead-Based Paint): DTSC and the Navy agreed on LBP notification language with FOST #1 and that language was carried through to FOST #2. FOST #3 did not have any LBP issues. FOST #4 should include the same LBP notification language as FOSTs #1 and #2. See pages 5-12 and 5-13 of FOST #1 and pages 5-5 and 5-6 of FOST #2.	Text been changed to reflect that of FOST #2.

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Reviewer: Quang Than, Department of Toxic Substances Control, Dated: September 12, 2008

Comment No.	Section/ Page No.	Comment	Response
12.	Section 4.5.1	Section 4.5.1 (Carve-Out I-B (Figure 3): The FOSL (Table 14) shows a PCB non-transformer item within Building 651. Please correct.	Text has been added to clarify that Building 651 has been demolished and the non-PCB item was removed during demolition activities.
13.	Section 4.5.3	Section 4.5.3 (Carve-Out III-D (Figure 15)): The FOSL (Table 14) shows the concentration of the PCB non-transformer item within Building 178 as 3.8 ppm, not less than 1.0 ppm as indicated in this FOST. Please correct.	Text has been changed to reflect the comment.
14.	Section 5	Section 5 (Summary of Restrictions): Please delete this section and incorporate the information into Section 4 (Summary of Environmental Conditions and Notifications). See General Comment #2 above.	See response to General comment #2 above.

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Comment No.	Section/ Page No.	Comment	Response
15.	Section 5.1	<p>(Petroleum Products and Derivatives)</p> <p>a. The RWQCB is the lead regulatory agency for UST Sites 651-1, 651-2, 651-3, 651-4, 254, and 65A which have on-going petroleum corrective actions associated with them. DTSC discussed these UST Sites with the RWQCB on September 9, 2008. The RWQCB indicated they are satisfied with the restrictions listed in this section and the corresponding "no dig areas" shown on Figures 3, 9, and 10. The RWQCB will respond to the Navy in writing regarding their review of FOST #4.</p> <p>b. Will the Navy retain responsibility for corrective action until the corrective action is complete and federal and state cleanup levels have been met? This information should be provided in the FOST.</p> <p>c. References should be made, within the text of this section, to the "no dig areas" shown on Figures 3, 9, and 10.</p>	<p>a. Comment noted.</p> <p>b. Text has been added to Section 5.1 to reflect that the DoN will retain clean-up responsibilities for carve-outs I-B, I-L, and I-M.</p> <p>c. Sections 5.1.1, 5.1.2, & 5.1.3 now have the following text:</p> <p>"In order to protect present or future human health, safety, and the environment, the transferee shall refrain from the following acts within the area designated on Figure 3 without prior review and written approval from the RWQCB until the cleanup objectives have been achieved:"</p>
16.	Section 5.2	<p>Section 5.2 (Asbestos-Containing Material): Table 6 shows that no ACM survey was conducted for Building 47 located in CO I-I. That being the case, please include the appropriate restriction for CO I-I (see restrictions for buildings 308, 637, and 764).</p>	<p>Building 47 has been demolished; therefore, no ACM restrictions for this building.</p>
17.	Section 5.3	<p>Section 5.3 (Lead-Based Paint): Table 6 shows Building 47 as being located in CO I-I. The date of construction listed is 1943. Please include the appropriate lead-based paint restriction for Building 47.</p>	<p>Building 47 has been demolished; therefore, no LBP restrictions for this building. The reference to Building 47 has been removed from Table 6.</p>

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Reviewer: Quang Than, Department of Toxic Substances Control, Dated: September 12, 2008

Comment No.	Section/ Page No.	Comment	Response
18.	Section 6	Section 6 (Adjacent Properties): Please delete this section and incorporate the information into Section 4 (Summary of Environmental Conditions and Notifications). See General Comment #2 above.	See response to General comment #2 above.

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Comment No.	Section/ Page No.	Comment	Response
19.	Section 6.1	Section 6.1 (Carve-Out I-B (Figure 3)): Please provide additional information regarding the abandoned petroleum UST on CO I-Q. What is the current status of the site? What additional remediation is required? Why is there such an "extensive" buffer zone and why is it not shown on Figure 3? Is there really "no possibility" of future contamination to CO I-B from the abandoned petroleum UST on CO I-Q? Please explain.	<p>The site is presently under remediation. The tank and any contaminated soil will be removed. To clarify the "no possibility" statement, soil borings indicate that the contamination is confined to the area immediately adjacent to the tank site which is approximately 320 feet from the edge of CO I-B. The section 6.1 has been changed to read as follows:</p> <p>"This CO adjoins CO I-Q which contains abandoned petroleum UST. UST 367 is a 2,500-gallon diesel tank that was abandoned in February 1994.</p> <p>The soil borings analytical data indicate that the contamination is confined to the area immediately adjacent to the UST 367 site which is approximately 320 feet from the edge of CO I-B. There is no groundwater contamination at UST 367. Therefore, no possibility of future contamination to CO I-B from the abandoned UST 367."</p> <p>The purpose of the buffer zone is to protect human health and the environment from hazardous substances. In the case of this carve-out I-Q, the buffer zone is the entire carve-out area of I-Q as noted on Fig 3.</p> <p>During preparation of the MCAS El Toro 2004 FOSL, carve-outs were established based on LOCs that required further evaluation/closure before the property could be transferred.</p> <p>If a facility (e.g., Building 367) had a UST that required closure the footprint of the carve-out encompassed the facility as well as area surrounding the UST site in order to allow further evaluation and provide access to the site for Navy to complete remedial activities.</p>

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Comment No.	Section/ Page No.	Comment	Response
20.	Section 6.2	Section 6.2 (Carve-out I-G (Figure 5)): This section describes property adjoining CO I-G that contains groundwater in the final stages of remediation. An explanation for why this groundwater poses no threat to CO I-G should be included. Is the groundwater plume within CO I-F designated as Installation Restoration Program (IRP) Site 16? If so, please state in the FOST.	<p>Figure has been revised to clarify groundwater plume buffer zone.</p> <p>Text has been revised to clarify that the adjacent groundwater plume is associated with IRP Site 16 and that the groundwater beneath CO I-G has not been impacted. CO I-G is approximately 300 feet from the edge of outside the boundary of the IRP Site 16 groundwater plume buffer zone.</p> <p>This CO adjoins CO I-F which contains a groundwater with VOC contaminants. A 300-foot buffer zone around the maximum predicted extent of the groundwater plume, as indicated by the groundwater model, is designed to prevent construction of groundwater extraction wells that could cause the plume to migrate and impact the cleanup remedy. Because CO I-G is outside the 300-foot buffer zone and remedial actions are underway for the Site 16 plume, no impact to CO I-G is anticipated.</p>
21.	Section 6.3	Section 6.3 (Carve-Out II-G (Figure 12)): Please show the buffer zones for COs II-H and II-M on Figure 12.	Figure 12 has been revised to indicate buffer zones for COs II-H and II-M.

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22.	Section 6.4	Section 6.4 (Carve-Out III-D (Figure 15)): Is the groundwater plume within CO III-B designated as IRP Site 24? If so, please state in the FOST. Please also show TAA 765 on Figure 15.	<p>TAA 765 location has been added on Figure 15. Section 6.4 has been revised to read as follows:</p> <p>This CO has a common border to the south with CO III-B. The primary contaminant of CO III-B is a groundwater plume that is presently under remediation as IRP Site 24. When the Final ROD for OU-1 Site 18 and OU-2A Site 24 was completed in 2002 (DON 2002), the updated plume and 500 foot buffer zone were no longer located beneath CO III-D. Consequently, groundwater restrictions due to the Site 24 VOC plume are not applicable to CO III-D. Also, within CO III-B is former LOC TAA 765 immediately adjacent to CO III-D that received regulatory NFA concurrence on November 17, 1998 (DTSC 1998).</p> <p>TAA 765 has been added to Figure 15.</p>
23.	Section 7	Section 7 (School Site Considerations): Please delete this section and incorporate the notification into Section 4 (Summary of Environmental Conditions and Notifications).	School Site Considerations will be inserted into Section 4.
24.	Section 8	Section 8 (Covenants), Line 10: Please change "CO I-J" to "CO I-I".	Text has been revised to reflect comment.
25.	Section 11	Section 11 (References): Please add the 2004 Final FOST. The Draft EBS dated 2/1/2003 by Earth Tech should be listed in the references because it is referenced in Table 3.	References have been added.

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Comment No.	Section/ Page No.	Comment	Response
26.	Table 1	<p>Table 1 (Buildings/Structures/Facilities):</p> <p>a. Building 439 is designated as a "Branch Dental/Medical Clinic". The FOSL contained a "Medical/Biohazardous Waste" notification for Building 439 (CO I-B). Please include the same notification in this FOST.</p> <p>b. Please include Building 47 in this table since Table 6 shows Building 47 in CO I-I.</p>	<p>a. Per BRRM guidance, "Medical/Biohazardous Waste" is not an applicable notification topic. However, since completion of the FOSL, the investigation of PRL 439 and associated SRU-1 has been completed. NFI concurrence was received from the EPA on 4/17/2008 and DTSC on 8/21/2008. Furthermore, all the LOCs for Building 439 are discussed in Table 3 and 4 to include prior use of the building.</p> <p>b. Building 47 has been demolished, and will be deleted from Table 6, therefore, it is excluded from Table 1.</p>
27.	Table 2	<p>Table 2 (Environmental Requirements and Notifications) – This table is not entirely consistent with the text. Please complete a thorough review of the table and ensure consistency with the text. According to the BRRM, all of the environmental factors ("topics") that are applicable to the FOST property should be summarized in Section 4 (Summary of Environmental Requirements and Notifications).</p>	<p>Table 2 has been updated and all environmental factors (topics) that are applicable to FOST#4 properties are discussed in Section 4. As stated in the first paragraph of section 4.1, the closure actions are noted in Table 4.</p>
28.	Table 3	<p>Table 3 (Potential Release Locations): DTSC recently issued a NFI concurrence on PRLs 46 and 439. Please update the table.</p>	<p>The tables have been updated.</p>

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29.	Table 4	<p>Table 4 (Locations of Concern):</p> <p>a. Page 1, USTs 439A and 439B: Please verify if the date of the OCHCA letter was September 12 or December 9, 1996 and correct if necessary.</p> <p>b. Page 3, OWS 651-8: Please indicate whether DTSC provided concurrence on this closure of the OWS.</p> <p>c. Page 3, SRU 1: DTSC issued the NFI letter for PRL 439/SRU 1 on August 21, 2008. Please update the table.</p> <p>d. Page 3, RAD: To ensure consistency with Attachment 4b, please insert "Unknown" into the second column.</p> <p>e. Page 5, SRU 3A: The table notes that DTSC's comments on SRU 3A need to be addressed. Please update the status of the comment resolution effort. Concurrence by DTSC should be documented if applicable.</p>	<p>a. The correct date is 12/9/1996</p> <p>b. The only letter of concurrence is from the RWQCB dated 9/28/2000.</p> <p>c. PRL status information has been updated.</p> <p>d. The table has been changed to reflect this comment.</p> <p>e. Table 4 has been revised to state that SRU 3A was further investigated and sampled as PRL 46. NFI status identified in Final Summary Report for Group IV PRLs. EPA concurrence obtained for NFI for PRL 46 on 4/17/2008 and DTSC concurrence obtained for NFI for PRL 46 on 8/21/2008</p>
30.	Table 6	Table 6 (Summary of Asbestos Surveys): Please include the IT Corp (1989) reference in Section 11 (References).	Reference has been added.
31.	Table 7	Table 7 (Monitoring/Bioventing/SVE Wells): 651 SVE-7 is listed in this table, but it's not included in Figure 3. Please ensure consistency between Table 7 and Figure 3.	651 SVE-7 has been added to the Figure 3. Table 7 and Figure 3 have been reviewed for consistency.

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Reviewer: Quang Than, Department of Toxic Substances Control, Dated: September 12, 2008

Comment No.	Section/ Page No.	Comment	Response
32.	Figure 2	<p>a. CO I-I is missing from the map. Please correct.</p> <p>b. The legend indicates there should be a gray area on the map showing a "Transferred Parcel", but it is missing. Please correct.</p>	<p>a. CO I-I has been labeled on Figure 2.</p> <p>b. "Transferred Parcel" has been deleted from the legend.</p>
33.	Figure 3 through 15	<p>a. The "Earth Tech 2003b" reference is not consistent with Section 11 (References), which shows "Earth Tech 2003". Please correct.</p> <p>b. The outline for buildings in some figures, e.g. Figures 3, 5, 13, 14, and 15, is thicker and of a different color than all of the rest of the buildings. It should be consistent with the legend and with other figures.</p>	<p>a. The "b" has been removed from the figures.</p> <p>b. The disparity among the various building designations has been corrected.</p>
34.	Figure 3 (Carve-Out I-B).	<p>a. Please provide this figure on an 11x17 sheet of paper.</p> <p>b. Table 7 shows CO I-B with an additional well (651 SVE 7) that is not included in this figure. Please ensure consistency between Table 7 and Figure 3.</p> <p>c. For Building 439, it would be helpful if the building number is different from the site number, as is the case in Figure 13.</p>	<p>a. Change not made, this present size is appropriate for the FOST.</p> <p>b. Change made per response 31.</p> <p>c. The font for "439" will be enlarged to differentiate from the site #s.</p>
35.	Figure 7	Figure 7 (Carve-Out I-I): Please show Building 47 on the figure.	As noted in response 26. b., Building 47 has been demolished.

Document Title:

Draft Finding of Suitability to Transfer #4, (Carve-Outs I-B, I-E, I-G, I-H, I-I, I-J, I-L, I-M, I-P, II-G, II-I, II-P, and III-D) Former Marine Corps Air Station, El Toro, CA, August 2008

Reviewer: Quang Than, Department of Toxic Substances Control, Dated: September 12, 2008

Comment No.	Section/ Page No.	Comment	Response
36.	Figure 12	Figure 12 (Carve-Out II-G): Please show the buffer zones for Carve-Outs II-H and II-M on the figure. The buffer zones are discussed in Section 6.3.	See response 21.
37.	Figure 15	a. Please show TAA 765 on the figure. TAA 765 is discussed in Section 6.4. b. Are there monitoring wells, or any other equipment associated with IRP Site 13 that should be shown on this figure? Please see Specific Comment #8 above.	a. See response 22. b. There are no monitoring wells or other equipment associated with IPR 13.
38.	Attachment 3	Attachment 3 (Final RCRA Corrective Action Determination Package): Please change the heading to read "Proposed RCRA Corrective Action Complete Determination Package". Also, please change the same heading shown on page iv of the Table of Contents.	This change has been made to reflect the comment
39.	Attachment 4a	Attachment 4a (Petroleum Products Notification Table): USTs 75D and 392D list "Diesel" as the "Petroleum Product", however, this is not consistent with what is listed in Table 4, which is "Heating Oil" and "Gasoline", respectively. Please ensure consistency between the attachment and table.	This change has been made to reflect the comment.
40.	Attachment 4b	Attachment 4b (Hazardous Substances Notification Table), page 1 of 4 – In CO I-B it shows a Non-Trans 651. This is not consistent with the text, Table 4 or Figure 3. Please correct.	This change has been made to reflect the comment.

Editorial Comments

Document Title:

Draft Finding of Suitability to Transfer #4, (Carve-Outs I-B, I-E, I-G, I-H, I-I, I-J, I-L, I-M, I-P, II-G, II-I, II-P, and III-D) Former Marine Corps Air Station, El Toro, CA, August 2008

Reviewer: Quang Than, Department of Toxic Substances Control, Dated: September 12, 2008

Comment No.	Section/ Page No.	Comment	Response
1.	Page iv	Page iv (Attachments): In order to be consistent with the attachments themselves, please change 4a to read, "Petroleum Products Notification Table" and 4b to read, "Hazardous Substances Notification Table".	Text on page iv has been revised to reflect comment.
2.	Section 3	Section 3 (Regulatory Coordination), Paragraph 1, Line 2: Please insert "the" between "under" and "Comprehensive".	Text has been revised to reflect comment.
3.	Section 3	Section 3 (Regulatory Coordination), Paragraph 2, Line 1: Please insert "Region 9" after "U.S. EPA".	Text has been revised to reflect comment.
4.	Section 3	Section 3 (Regulatory Coordination), Paragraph 2, Line 3: Please change "Facilities" to "Facility".	Text has been revised to reflect comment.
5.	Section 3.1	Section 3.1 (Resource Conservation and Recovery Act Part B Permit and Subtitle C Corrective Action), Paragraph 4: Title 22 CCR section 66264.101(a) provides "The owner or operator . . . hazardous waste management unit at the facility.	The "a" has been changed to "the".
6.	Section 3.2	Section 3.2 (Resource Conservation and Recovery Act Subtitle I Corrective Action), Paragraph 1 - The citation for authority to require corrective action at UST sites should read title 23, California Code of Regulations, division 3, chapter 16.	Text has been revised to reflect comment.
7.	Section 3.2	Section 3.2 (Resource Conservation and Recovery Act Subtitle I Corrective Action), Paragraph 2 - Title 23 CCR section 2725(c) states that "The regulatory agency shall concur . . . will restore and protect current or potential beneficial uses of water."	Text has been revised to reflect comment.

Document Title:

Draft Finding of Suitability to Transfer #4, (Carve-Outs I-B, I-E, I-G, I-H, I-I, I-J, I-L, I-M, I-P, II-G, II-I, II-P, and III-D) Former Marine Corps Air Station, El Toro, CA, August 2008

Reviewer: Quang Than, Department of Toxic Substances Control, Dated: September 12, 2008

Comment No.	Section/ Page No.	Comment	Response
8.	Section 3.2	Section 3.2 (Resource Conservation and Recovery Act Subtitle I Corrective Action), Paragraph 4 - Please note that section 25296.10 was added to the Health and Safety Code in 2002 (AB 2481) and has not been amended.	Text has been revised to reflect comment.
9.	Section 4	Section 4 (Summary of Environmental Conditions and Notifications), Paragraph 3, Last Line – In order to be consistent with the references, please change “(DTSC 2005)” to “(DTSC 2005a)”.	Text has been revised to reflect comment.
10.	Section 4	Section 4 (Summary of Environmental Conditions and Notifications), Paragraph 5, Lines 4 and 5– In order to be consistent with Attachment 4, please change to read, “4a and 4b – Petroleum Products and Hazardous Substances Notification Tables respectively.”	Text has been revised to reflect comment.
11.	Section 4.1.1	Section 4.1.1 (Carve-Out I-B (Figure 3)), RFA Site – Because Building 651 was demolished, please change “is” to “was”.	Text has been revised to reflect comment.
12.	Section 4.1.1	Section 4.1.1 (Carve-Out I-B (Figure 3)), RAD – Please include the missing punctuation in line 1. In line 2, please insert “from the” between “concurrence” and “California”.	Text has been revised to reflect comment.
13.	Section 5.1	Section 5.1 (Petroleum Products and Derivatives) – Please change “correction” to “corrective”.	Text has been revised to reflect comment.
14.	Section 5.1.1	Section 5.1.1 (Carve-Out I-B (Figure 3)), Line 1 – Please insert “for NFA” after “concurrence”.	Text has been revised to reflect comment.
15.	Section 5.1.3	Section 5.1.3 (Carve-Out I-M (Figure 10)) – Please change “UST 65” to “UST 65A”.	Text has been revised to reflect comment.

Document Title:

Draft Finding of Suitability to Transfer #4, (Carve-Outs I-B, I-E, I-G, I-H, I-I, I-J, I-L, I-M, I-P, II-G, II-I, II-P, and III-D) Former Marine Corps Air Station, El Toro, CA, August 2008

Reviewer: Quang Than, Department of Toxic Substances Control, Dated: September 12, 2008

Comment No.	Section/ Page No.	Comment	Response
16.	Section 11	Section 11 (References), Page 15 – In the reference starting with 2003e, please delete “Findings of”.	Text has been revised to reflect comment.
17.	Table 3	Table 3 (Potential Release Locations) - Please include “VSI” at the bottom of the table and change “LOC” to “Location of Concern” instead of “Aboveground Storage Tank”.	Text has been revised to reflect comment.
18.	Table 4	Table 4 (Locations of Concern) – The word “quadrant” is misspelled a couple of times. On page 11 of 14, the date of DTSC approval for the Environmental Baseline Survey should be 9/25/2003, according to Section 11 (References). Please include the following acronyms at the bottom of the table: HRA, AST, MCAS, NFI, RAD, PRL, PRG, RCRA, and BRAC.	Text has been revised to reflect comment.
19.	Table 5	Table 5 (Locations of Concern With On-going Petroleum Corrective Actions) – Please include RWQCB in the acronym list at the bottom of the table.	Text has been revised to reflect comment.
20.	Table 7	Table 7 (Monitoring/Bioventing/SVE Wells) – At the bottom of the table, please change “RO” to “ROI”.	Text has been revised to reflect comment.
21.	Attachment 4b	Attachment 4b: Please change “Substance” to “Substances”.	Text has been revised to reflect comment.

Attachment 2
Navy Initiated Revisions to November 2008 Draft Final

Navy Initiated Revisions to the November 2008 Draft Final Finding of Suitability for Transfer (FOST) #4

During the November 22, 2008 to January 6, 2009 Public Comment Period for FOST #4, the Navy received a No Further Action concurrence letter from the Santa Ana Regional Water Quality Control Board for the petroleum corrective action within Carve-Out (CO) I-L. Based on receipt of the December 2, 2008 letter, all restrictions associated with CO I-L identified in the November 2008 Draft Final FOST #4 have been deleted. All text, figures and tables associated with the CO have been updated to reflect that no further action related to the underground storage tank release is required.

However, CO I-L will not be included in the Department of Toxic Substances Control (DTSC) Resource Conservation and Recovery Act (RCRA) Corrective Action Complete Determination associated with FOST #4. The Navy will request this action at a later time.

Attachment 3
Final RCRA Corrective Action Complete
Determination Package



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maureen F. Gorsen, Director
5796 Corporate Avenue
Cypress, California 90630



Arnold Schwarzenegger
Governor

January 12, 2009

Marine Corps Air Station El Toro
Base Realignment and Closure
Attn: Ms. Debra Theroux
Deputy Base Closure Manager
7040 Trabuco Road
Irvine, California 92618

CONCURRENCE ON FINDING OF SUITABILITY TO TRANSFER #4 (CARVE-OUTS I-B, I-E, I-G, I-H, I-I, I-J, I-L, I-M, I-P, II-G, II-I, II-P, AND III-D), FORMER MARINE CORPS AIR STATION EL TORO, IRVINE, CALIFORNIA

Dear Ms. Theroux:

The California Department of Toxic Substances Control (DTSC) has reviewed the electronic version of the *Final Finding of Suitability to Transfer #4 for Carve-Outs I-B, I-E, I-G, I-H, I-I, I-J, I-L, I-M, I-P, II-G, II-I, II-P, and III-D, Former Marine Corps Air Station El Toro, California* (FOST 4), dated January 2009. DTSC finds that all of our comments on previous versions of FOST 4 have been adequately addressed.

FOST 4 provides environmental findings that establish Carve-Outs I-B, I-E, I-G, I-H, I-I, I-J, I-L, I-M, I-P, II-G, II-I, II-P, and III-D as being suitable for transfer by deed. DTSC concurs that the property associated with FOST 4 can be transferred with the specified notifications, restrictions, and covenants in a manner that is protective of human health and the environment.

Thank you for providing DTSC with the opportunity to review FOST 4. If you have any questions about this letter, please contact Mr. Quang Than at (714) 484-5352 or qthan@dtsc.ca.gov.

Sincerely,

John E. Scandura
Performance Manager
Brownfields and Environmental Restoration Program

Ms. Debra Theroux
January 12, 2009
Page 2 of 2

cc:

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Arnold Schwarzenegger
Governor

January 12, 2009

Marine Corps Air Station El Toro
Base Realignment and Closure
Attn: Ms. Debra Theroux
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7040 Trabuco Road
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RESOURCE CONSERVATION AND RECOVERY ACT CORRECTIVE ACTION COMPLETE DETERMINATION AND BOUNDARY MODIFICATION FOR TRANSFER PARCELS, FORMER MARINE CORPS AIR STATION EL TORO, IRVINE, CALIFORNIA

Dear Ms. Theroux:

The California Department of Toxic Substances Control (DTSC) completed its review of the Finding of Suitability to Transfer #4 (FOST 4) document dated January 2009. This document applies to Carve-Outs I-B, I-E, I-G, I-H, I-I, I-J, I-L, I-M, I-P, II-G, II-I, II-P, and III-D at the former Marine Corps Air Station (MCAS) El Toro and provides environmental findings that this property is suitable for transfer by deed. Based upon its review of FOST 4 and other supporting documentation, DTSC finds that corrective action pursuant to the California Health and Safety Code, chapter 6.5, section 25200.10 has been completed for all known releases of hazardous constituents on Carve-Outs I-E, I-G, I-H, I-I, I-J, I-P, II-G, II-I, II-P, and III-D proposed for transfer. The hazardous waste facility boundary of MCAS El Toro is hereby modified to exclude this property. Carve-Outs I-B, I-L, and I-M, also identified in FOST 4 as being proposed for transfer, are not included in this corrective action complete determination. Carve-Outs I-B and I-M have on-going corrective action for petroleum releases. Carve-Out I-L received a no further action during the recent public comment period. The Navy plans to pursue a corrective action complete determination for Carve-Out I-L at a later time.

MCAS El Toro is a hazardous waste facility that operated under a Resource Conservation and Recovery Act (RCRA) Part B Storage Permit, which expired in 2003. As a hazardous waste facility, MCAS El Toro must undertake corrective action for all releases of hazardous waste or constituents on all contiguous property it owned or operated. RCRA

corrective action applies to a broad range of releases that is not limited to hazardous waste. All spills and releases of fuel, oil, and hazardous chemicals are subject to RCRA corrective action. Accordingly, DTSC makes this determination that corrective action has been completed for the ten carve-outs listed above based on the review of its files, FOST 4, and on the findings, supporting documentation, and correspondence from the Santa Ana Regional Water Quality Control Board (RWQCB) and Orange County Health Care Agency (OCHCA).

The identification of hazardous waste or constituent releases was completed through a RCRA Facility Assessment, historical aerial photograph survey, aboveground and underground storage tank inventory and closure program, polychlorinated biphenyls transformer and equipment inventory, and other assessments conducted under the United States Navy's Installation Restoration Program. DTSC determined that no RCRA-regulated hazardous waste treatment, storage, or disposal units exist on the carve-outs proposed for deed transfer in FOST 4. The following locations of concern were identified and addressed within the ten carve-outs subject to this determination:

- 1) Twelve hazardous substance locations of concern that received regulatory concurrence for no further action decisions,
- 2) Thirty-nine aboveground and underground storage tank sites that received regulatory closure letters, and
- 3) Eleven other locations of concern that were evaluated, including, polychlorinated biphenyl equipment and transformers, oil water separators, silver recovery units, suspected radiological sites, and an aerial photograph anomaly site.

The MCAS El Toro FOST 4 documents environmental findings to support that the property proposed for transfer is suitable for transfer by deed. FOST 4 further documents that with the exception of five underground storage tank sites that have on-going corrective action for petroleum releases, corrective action has been conducted for all hazardous waste, hazardous substances and hazardous constituent releases identified by previous environmental assessments and that those actions were conducted to adequately protect human health, safety and the environment. Finally, FOST 4 documents that the deed transfer property will not be negatively impacted by adjacent and contiguous properties where corrective action is not complete.

This Corrective Action Complete Determination is based on the completeness of environmental assessments to identify releases and the accuracy of documentation provided to DTSC. Where the OCHCA and the RWQCB provided regulatory closure letters pertaining to those areas subject to their regulatory purview, DTSC did not independently review these actions and bases its determination on the respective agency findings. Should new information arise about uncontrolled releases of hazardous wastes, substances, or constituents on the ten carve-outs subject to this determination, DTSC reserves the right to require corrective action.

Ms. Debra Theroux
January 12, 2009
Page 3

If you have questions or comments concerning this matter, please contact
Mr. Quang Than, at (714) 484-5352 or qthan@dtsc.ca.gov.

Sincerely,



John E. Scandura
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Brownfields and Environmental Restoration Program

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NOTICE OF EXEMPTION

To: Office of Planning and Research
State Clearinghouse
P.O. Box 3044, 1400 Tenth Street,
Room 212
Sacramento, CA 95812-3044

From: Department of Toxic Substances Control
Brownfields and Environmental
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5796 Corporate Avenue
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Project Title: Corrective Action Complete Determination for Carve-Outs I-E, I-G, I-H, I-I, I-J, I-P, II-G, II-I, II-P, and III-D identified in Finding of Suitability to Transfer (FOST) #4 and Change of Facility Boundary at Former Marine Corps Air Station El Toro, CA

Project Location: Former Marine Corps Air Station (MCAS) El Toro

County: Orange

Project Description:

[Update: On December 2, 2008, the Regional Water Quality Control Board (Santa Ana Region) provided a determination of no further action (NFA) for former underground storage tank release site 254 (UST-254), located on Carve-Out (CO) I-L. The NFA confirms the completion of the site investigation and remedial action which were required to mitigate the release of fuel oil from UST-254. This NFA was received during the recent public comment period for FOST #4 and the Corrective Action Complete Determination and Change of Facility Boundary for COs I-E, I-G, I-H, I-I, I-J, I-P, II-G, II-I, II-P, and III-D (November 22, 2008 through January 6, 2009). The Department of Navy will pursue the Corrective Action Complete Determination and Change of Facility Boundary for CO I-L at a later time, however CO I-L is now proposed for transfer without restrictions.]

The Department of Toxic Substances Control (DTSC) is making a determination that corrective action has been completed for approximately 18.8 acres of property at the former MCAS El Toro. The property is identified in FOST #4 as Carve-Outs (COs) I-E, I-G, I-H, I-I, I-J, I-P, II-G, II-I, II-P, and III-D. FOST #4 addresses 13 COs, of which this Notice of Exemption (NOE) addresses 10. The 3 remaining COs (I-B, I-L, and I-M) identified in FOST #4, which comprise approximately 24.1 acres, include 6 underground storage tank sites that have on-going corrective action for petroleum releases. All other corrective action has been completed. Because COs I-B, I-L, and I-M have on-going corrective action, they are not included in this corrective action complete determination and will remain within the facility boundary. The Department of the Navy (DON), however, intends to transfer COs I-B, I-L, and I-M with restrictions in place, which will ensure that these COs are environmentally suitable for transfer and that post-transfer use of these COs is protective of human health and the environment. Under the oversight of the Santa Ana Regional Water Quality Control Board (RWQCB), DON will continue on-going corrective action for petroleum releases at COs I-B, I-L, and I-M post-transfer.

The 10 COs addressed in this NOE and identified in FOST #4, were subject to corrective action requirements of the California Hazardous Waste Control Law and the federal Resource Conservation and Recovery Act (RCRA) because they were part of the property of MCAS El Toro, which is an inactive RCRA hazardous waste facility. MCAS El Toro had a RCRA

permit that expired in 2003. The RCRA corrective action requirements for COs I-E, I-G, I-H, I-I, I-J, I-P, II-G, II-I, II-P, and III-D have been completed through investigation and cleanup actions overseen by the DTSC, the RWQCB, and the United States Environmental Protection Agency (U.S. EPA) under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA); and by underground/aboveground storage tank (UST/AST) investigation and cleanup actions overseen by the RWQCB and the Orange County Health Care Agency (OCHCA). This RCRA corrective action complete determination allows the DON to transfer identified COs to new owners without transferring the associated RCRA corrective action liability. There are no additional physical activities associated with this corrective action complete decision by DTSC for the MCAS El Toro COs I-E, I-G, I-H, I-I, I-J, I-P, II-G, II-I, II-P, and III-D. There are building use restrictions associated with the property transfer due to the presence of lead-based paint and asbestos-containing building materials on buildings.

DON is retaining approximately 939.5 acres of the facility where closure and corrective action have not been completed. This retained property remains subject to RCRA closure and corrective action requirements. A map is included in FOST #4 which shows the new RCRA hazardous waste facility boundaries for the former MCAS El Toro after removing COs I-E, I-G, I-H, I-I, I-J, I-P, II-G, II-I, II-P, and III-D. Consistent with its decision that RCRA corrective action has been completed, DTSC is changing the boundaries of the former MCAS El Toro RCRA hazardous waste facility property.

Background:

Construction of the former MCAS El Toro began in July 1942, and the Station was commissioned in March 1943. MCAS El Toro was a United States Marine Corps pilot's fleet operational training center and air station in support of Fleet Marine Forces, Pacific. Station activities included aircraft operations and maintenance. The 1993 Defense Base Realignment and Closure (BRAC) Commission recommended MCAS El Toro for closure. MCAS El Toro was operationally closed in 1999. MCAS El Toro occupied 4,712 acres until 1998, when 23 acres were transferred to the California Department of Transportation for an expansion of California Interstate 5. In 2001, 896.7 acres of the northeast portion were transferred to the Federal Aviation Administration. In 2004 (FOST #1) and 2005 (FOST #2) a total of 2,806 acres were transferred to a private developer. Earlier this year another 3.9 acres were transferred to the same private developer under FOST #3. FOST #4 includes 13 COs comprising approximately 42.9 acres. The remaining 939.5 acres are not currently suitable for transfer, and are being retained by the DON until environmental response actions, including closure and corrective action, are completed.

MCAS El Toro was listed on the U.S. EPA National Priorities List and a Federal Facility Agreement was signed under CERCLA in 1990. Since then, MCAS El Toro has been performing CERCLA environmental clean up and restoration under the guidance and regulatory authority of DTSC, the RWQCB, and the U.S. EPA.

The FOST #4 Carve-Outs:

FOST #4 summarizes the investigation and cleanup of releases of hazardous substances on the COs. The purpose of this FOST is to summarize how the requirements and notifications for hazardous substances, petroleum products, and other regulated material within the FOST #4 COs have been satisfied by the DON. The FOST COs are real property made available through the BRAC process and are suitable for transfer by deed through provisions

of Section 120(h) of CERCLA. In addition, the FOST identifies use restrictions and disclosure notifications, as specified in the “Summary of Restrictions” and “Summary of Environmental Conditions and Notifications” sections, necessary to protect human health and the environment.

The FOST #4 COs include approximately 42.9 acres of developed and undeveloped land on portions of Parcels I, II, and III. Each of the parcels was evaluated for areas where a release is suspected to have occurred; where a documented release has occurred; or, based on the types of activities that occurred in an area, had the potential for a past release. These areas are identified as Locations of Concern, or LOCs. The types of LOCs present within the FOST #4 COs include: hazardous substances sites, RCRA Facility Assessment (RFA) sites, temporary accumulation areas (TAAs), aerial photograph feature/anomaly (APHO) sites, Installation Restoration Program (IRP) sites, ASTs, USTs, Oil/Water Separator (OWS) sites, Silver Recovery Units (SRUs), Radiological (RAD) sites, and polychlorinated biphenyls (PCB)-containing transformers and equipment. FOST #4 also identifies 6 Potential Release Locations (PRLs). FOST #4 documents that corrective action has been completed for all of the COs proposed for transfer, with the exception of on-going petroleum corrective action at 6 USTs in COs I-B, I-L, and I-M. As stated previously, COs I-B, I-L, and I-M are not included in this NOE because they require additional documentation in order to satisfy the corrective action requirements under RCRA.

CO I-E – consists of approximately 0.9 acres and is located in the western portion of the former base. It contains 1 LOC and no buildings/structures.

CO I-G – consists of approximately 0.4 acres and is located in the western portion of the former base. It contains 2 LOCs and 1 building/structure.

CO I-H – consists of approximately 0.8 acres and is located in the western portion of the former base. It contains 1 LOC, 1 PRL, and no buildings/structures.

CO I-I – consists of approximately 1.1 acres and is located in the western portion of the former base. It contains 5 LOCs, 2 PRLs and no buildings/structures.

CO I-J – consists of approximately 0.7 acres and is located in the western portion of the former base. It contains 1 LOC and no buildings/structures.

CO I-P – consists of approximately 1.8 acres and is located in the northern portion of the former base. It contains 4 LOCs and no building/structures.

CO II-G – consists of approximately 7.7 acres and is located in the eastern portion of the former base. It contains 1 LOC and no buildings/structures.

CO II-I – consists of approximately 0.4 acres and is located in the eastern portion of the former base. It contains 12 LOCs and 3 buildings/structures.

CO II-P – consists of approximately 0.3 acres and is located in the eastern portion of the former base. It contains 4 LOCs and 1 building/structure.

CO III-D – consists of approximately 4.7 acres and is located in the western portion of the former base. It contains 10 LOCs and 1 building/structure.

FOST #4 includes warranted notifications and restrictions on certain activities to ensure post-transfer use of the FOST COs is protective of human health and the environment. Notifications are disclosures associated with each CO such as locations of the LOCs/PRLs and typical real property disclosures including but not limited to: use and storage of hazardous substances and petroleum products, closed CERCLA cleanup sites, former USTs/ASTs, OWSs, PCBs, schools, asbestos-containing materials (ACM) and lead-based paint (LBP). Since LBP and asbestos abatement has not been completed in all buildings, specific restrictions limit or prevent certain occupancy or use of these buildings pending either ACM and LBP surveys and abatement or proper demolition. Also, since 6 UST sites at COs I-B, I-L, and I-M have on-going corrective action for petroleum releases, specific restrictions limit or prevent certain activities or use of the property without prior review and written approval from the RWQCB until cleanup objectives have been achieved. These notifications and restrictions, which will be included in the deed(s) for transfer, will ensure post-transfer use of the FOST COs is protective of human health and the environment.

Finally, FOST #4 contains access provisions, and in accordance with CERCLA, FOST #4 provides for a covenant. The deed for transfer of COs I-B, I-E, I-G, I-H, I-I, I-J, II-G, II-I, and III-D, will include a CERCLA covenant, warranting that all remedial action necessary to protect human health and the environment with respect to any hazardous substances remaining on the property has been taken before the date of such transfer and that any additional remedial action found to be necessary after the date of such transfer shall be conducted by the United States. COs I-L, I-M, I-P, and II-P were only contaminated by petroleum or its derivatives, therefore, COs I-L, I-M, I-P, and II-P shall be conveyed "as is" without a CERCLA covenant.

Name of Public Agency Approving Project: Department of Toxic Substances Control

Name of Person or Agency Carrying Out Project: Department of Toxic Substances Control

Exemption Status: (check one)

- ☐ Ministerial [PRC, Sec. 21080(b)(1); CCR, Sec. 15268]
- ☐ Declared Emergency [PRC, Sec. 21080(b)(3); CCR, Sec. 15269(a)]
- ☐ Emergency Project [PRC, Sec. 21080(b)(4); CCR, Sec. 15269(b)(c)]
- ☐ Categorical Exemption: [State type and section number]
- ☐ Statutory Exemptions: [State code section number]
- ☒ General Rule [CCR, Sec. 15061(b)(3)]

Exemption Title: With certainty, no possibility of a significant environmental effect.

Reasons Why Project is Exempt:

1. The project does not involve any physical activities at the former MCAS El Toro. The project is an administrative decision by DTSC that previously completed investigations and cleanup activities conducted under the regulatory oversight of DTSC, RWQCB, U.S. EPA, and the OCHCA, on COs I-E, I-G, I-H, I-I, I-J, I-P, II-G, II-I, II-P, and III-D, property identified in FOST #4, have satisfied the corrective action requirements under RCRA and the California Hazardous Waste Control Law. The boundary defining the former MCAS El Toro hazardous waste facility is being modified to exclude the property comprising COs

I-E, I-G, I-H, I-I, I-J, I-P, II-G, II-I, II-P, and III-D. No offsite impacts will occur as a result of moving the facility boundaries.

2. The entire former MCAS El Toro is listed on the Hazardous Waste and Substances Site List and on the Calsites List. However, for the property identified in FOST #4 as COs I-E, I-G, I-H, I-I, I-J, I-P, II-G, II-I, II-P, and III-D, all environmental studies and remedial action under CERCLA necessary to protect human health and the environment with respect to hazardous substances remaining on the property have been taken. Additionally, all investigations and cleanups conducted with RWQCB and OCHCA oversight, with respect to petroleum products and petroleum derivatives, have been taken. On this basis, DTSC finds that RCRA corrective action is complete for these COs.

Quang Than, Project Manager

(714) 484-5352

Lead Agency Contact Person

Phone #

DTSC Performance Manager Signature

1/12/09

Date

John E. Scandura

Performance Manager

DTSC Performance Manager Name

Title

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Date Received For Filing and Posting at OPR:

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County of Orange)

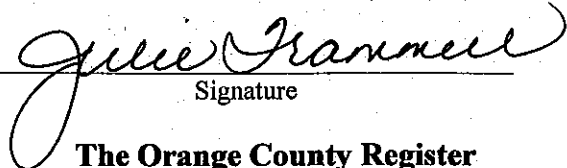
I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of **The Orange County Register**, a newspaper of general circulation, published in the city of Santa Ana, County of Orange, and which newspaper has been adjudged to be a newspaper of general circulation by the Superior Court of the County of Orange, State of California, under the date of 1/18/52, Case No. A-21046, that the notice, of which the annexed is a true printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

November 22, 2008

"I certify (or declare) under the penalty of perjury under the laws of the State of California that the foregoing is true and correct":

Executed at Santa Ana, Orange County, California, on

Date: November 22, 2008


Signature

The Orange County Register
625 N. Grand Ave.
Santa Ana, CA 92701
(714) 796-7000 ext. 2209

PROOF OF PUBLICATION

PUBLIC NOTICE

FORMER MARINE CORPS AIR STATION (MCAS) EL TORO

Finding of Suitability to Transfer (FOST) #4 and Proposed RCRA Corrective Action Complete Determination and RCRA Facility Boundary Modification

The Department of the Navy invites the public to review and comment on the Draft Final FOST #4 for approximately 42.9 acres of property at the former MCAS El Toro. The Draft Final FOST #4 concludes that property specifically identified in that document is environmentally suitable for transfer in accordance with Section 120(h) of the Comprehensive Environmental Response, Compensation, and Liability Act.

The California Department of Toxic Substances Control (DTSC) invites the public to review and comment on a proposed Resource Conservation and Recovery Act (RCRA) Corrective Action Complete Determination ("RCRA Determination") and RCRA Hazardous Waste Facility Boundary Modification ("RCRA Boundary Modification"). DTSC finds that the RCRA corrective action requirements for a portion of the FOST property, approximately 18.8 acres, have been completed through investigations and clean up actions; and proposes to exclude this property from the former MCAS El Toro RCRA hazardous waste facility property boundary. A summary of DTSC's proposed RCRA Determination and RCRA Boundary Modification has been included in the Draft Final FOST as a section of that document. DTSC has prepared a Notice of Exemption pursuant to the California Environmental Quality Act for the RCRA Determination and RCRA Boundary Modification.

Former MCAS El Toro is a RCRA hazardous waste facility (Facility). Its operating permit expired on August 18, 2003. Corrective action is required at RCRA Facilities to investigate and clean up contamination in the soil and groundwater from past practices. The Draft Final FOST #4 documents that all necessary corrective action has been completed for approximately 18.8 acres of the 42.9 acres of property proposed for transfer by deed. The remaining 24.1 acres includes 6 underground storage tank sites that have on-going corrective action for petroleum releases and therefore, requires additional documentation in order to satisfy the corrective action requirements under RCRA. While the 24.1 acres are not included in DTSC's proposed RCRA Determination, they are proposed for transfer with restrictions in place. These restrictions will ensure post-transfer use of the property is protective of human health and the environment. Maps and detailed descriptions of the property proposed for transfer, as well as, information and a map pertaining to the proposed RCRA Determination and RCRA Boundary Modification are included in FOST #4. The National Priorities List boundary for former MCAS El Toro remains unchanged.

PUBLIC REVIEW AND COMMENT PERIOD November 22, 2008 through January 6, 2009

The public is encouraged to comment on the Draft Final FOST #4 and DTSC's proposed RCRA Determination and RCRA Boundary Modification for former MCAS El Toro during the 45-day public comment period. These documents are available for public review and comment at former MCAS El Toro and at the information repository for former MCAS El Toro.

To review copies of these and other associated documents at former MCAS El Toro, please call (949) 726-5398 to set up an appointment. The information repository is located at: Heritage Park Regional Library, 14361 Yale Avenue, Irvine, California, (949) 551-7151 (call for current hours).

Submitting Public Comments

Written comments on the Draft Final FOST #4 should be postmarked, faxed, or e-mailed by **January 6, 2009**, and submitted to:

Ms. Debra Theroux
Deputy Base Closure Manager
Former MCAS El Toro
7400 Trabuco Road, Irvine, CA 92618
Fax: (949) 726-6586
E-mail: debra.theroux@navy.mil

For more information on the Draft Final FOST #4, please call Ms. Debra Theroux at (619) 532-0919.

Written comments on the proposed RCRA Determination and RCRA Boundary Modification should be postmarked, faxed, or e-mailed by **January 6, 2009**, and submitted to:

Mr. Quang Than
DTSC Project Manager
5786 Corporate Avenue, Cypress, CA 90630
Fax: (714) 484-5437
E-mail: qthan@dtsc.ca.gov

For more information on the RCRA Determination and RCRA Boundary Modification, please call Mr. Quang Than at (714) 484-5352. Also visit DTSC's EnviroStor website at: <http://www.envirostor.dtsc.ca.gov/public/>

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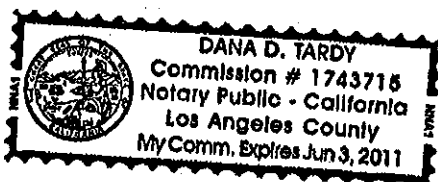
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FORMER MARINE CORPS AIR STATION (MCAS) EL TORO

Finding of Suitability to Transfer (FOST) #4

and

Proposed RCRA Corrective Action Complete Determination
and

RCRA Facility Boundary Modification

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The California Department of Toxic Substances Control (DTSC) invites the public to review and comment on a proposed Resource Conservation and Recovery Act (RCRA) Corrective Action Complete Determination ("RCRA Determination") and RCRA Hazardous Waste Facility Boundary Modification ("RCRA Boundary Modification"). DTSC finds that the RCRA corrective action requirements for a portion of the FOST property, approximately 18.8 acres, have been completed through investigations and clean up actions; and proposes to exclude this property from the former MCAS El Toro RCRA hazardous waste facility property boundary. A summary of DTSC's proposed RCRA Determination and RCRA Boundary Modification has been included in the Draft Final FOST as a section of that document. DTSC has prepared a Notice of Exemption pursuant to the California Environmental Quality Act for the RCRA Determination and RCRA Boundary Modification.

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November 22, 2008 through January 6, 2009

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Ms. Debra Theroux
Deputy Base Closure Manager
Former MCAS El Toro
7400 Trabuco Road, Irvine, CA 92618
Fax: (949) 726-6586
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**Notice
of
Proposed Corrective Action Complete
Determination
Former Marine Corps Air Station El Toro
Orange County, California**



The California Department of Toxic Substances Control (DTSC) is providing this notice to the community to review and comment on a proposed Resource Conservation and Recovery Act (RCRA) Corrective Action Complete Determination for approximately 18.8 acres at the former Marine Corps Air Station (MCAS) El Toro. This notice provides information regarding the purpose of the determination, the property subject to this determination, and the opportunity for public comment.

Introduction

MCAS El Toro was commissioned in 1943 as a Marine Corps pilot fleet operation training facility and was expanded into a master jet station and Marine Corps aviation center. The facility included runways, aircraft maintenance, training facilities, housing, and other support facilities. MCAS El Toro closed its operations in July 1999. The majority of the station facilities are now vacant and only limited activities occur on-site. They include facility maintenance, environmental investigations and cleanup of contaminated portions of the station.

What is RCRA Corrective Action?

RCRA corrective action is required of a hazardous waste facility to clean up contamination that resulted from past practices on their entire property. A hazardous waste facility is any facility that treats, stores, or disposes of hazardous waste in accordance with authorization issued under RCRA. MCAS El Toro had a RCRA permit that expired in August 2003. Permitted facilities are required to clean up contaminated soil, surface water, and groundwater to protect human health and the environment under a process known as corrective action.

Why is a RCRA Corrective Action Complete Determination Important?

A RCRA Corrective Action Complete Determination officially recognizes that all hazardous waste contamination has been cleaned up. It allows the Navy to transfer clean property at the former MCAS El Toro to new owners without transferring the corrective action liability.

Public Comment Period

**November 22, 2008
through
January 6, 2009**

The Department of Toxic Substances Control (DTSC) invites you to review and comment on the proposed Corrective Action Complete Determination for Carve-Outs I-E, I-G, I-H, I-I, I-J, I-P, II-G, II-I, II-P, and III-D at the former MCAS El Toro, as described in the Navy's Finding of Suitability to Transfer #4 (FOST 4). As the proposed determination will not create a significant effect upon the environment, DTSC has proposed a California Environmental Quality Act (CEQA) Notice of Exemption, which is also available for review.

All written comments on the proposed Corrective Action Complete Determination must be postmarked, faxed, or E-mailed no later than January 6, 2009, and sent to:

Quang Than
Project Manager
DTSC
5796 Corporate Avenue
Cypress, CA 90630

Fax: (714) 484-5437
E-mail: qthan@dtsc.ca.gov

For more information please call
Mr. Quang Than at
(714) 484-5352. Also visit DTSC's
EnviroStor website at:
<http://www.envirostor.dtsc.ca.gov/public>

At former MCAS El Toro, DTSC proposes to make this determination based on the completion of the investigation and cleanup of hazardous waste areas conducted under several programs. These programs are the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), overseen by DTSC, the Regional Water Quality Control Board (RWQCB), and the United States Environmental Protection Agency; and the underground/aboveground storage tank cleanup programs overseen by the RWQCB and the Orange County Health Care Agency (OCHCA). Where the RWQCB or the OCHCA has provided regulatory closure letters, DTSC has not conducted independent evaluations of these actions and is basing its determination on the respective agency findings.

What Property Is Subject to this Determination?

This proposed RCRA Corrective Action Complete Determination is for approximately 18.8 acres of property at the former MCAS El Toro, identified in the Department of Navy's Finding of Suitability to Transfer #4 (FOST 4) as Carve-Outs I-E, I-G, I-H, I-I, I-J, I-P, II-G, II-I, II-P, and III-D. Consistent with its proposed decision that RCRA corrective action has been completed for these 10 carve-outs, DTSC is changing the boundaries of the former MCAS El Toro RCRA hazardous waste facility property to exclude them. A map showing the revised MCAS El Toro hazardous waste facility boundary is attached.

What is the Basis for this Determination?

DTSC proposes to make this determination based on the completion of the investigation and cleanup of hazardous waste areas as documented in

the Department of Navy's *Draft Finding of Suitability to Transfer #4 for Carve-Outs I-B, I-E, I-G, I-H, I-I, I-J, I-L, I-M, I-P, II-G, II-I, II-P, and III-D, Former Marine Corps Air Station El Toro, California*, August 2008.

FOST 4 summarizes the Navy's environmental investigation activities conducted for each of the 13 carve-outs proposed for transfer, of which this proposed RCRA Corrective Action Complete Determination addresses 10. The 3 remaining carve-outs (I-B, I-L, and I-M), identified in FOST 4, have on-going corrective action for petroleum releases and require additional documentation in order to satisfy the corrective action requirements under RCRA.

FOST 4 provides the notifications and use restrictions necessary to protect human health and the environment that apply to the property being proposed for transfer, as well as, access provisions that will be contained in the deed for transfer. FOST 4 also provides for the CERCLA required covenant.

FOST 4 carve-outs comprise approximately 42.9 acres of developed and undeveloped land on portions of Parcels I, II, and III. Each parcel was evaluated for hazardous substance releases that may have occurred based on the types of historic activities that were conducted. The locations where past releases of hazardous substances may have occurred include sites where waste was handled, known spill or disposal sites, storage tanks, waste-water treatment system sites, suspected radiological sites, polychlorinated biphenyl transformers and equipment, and other miscellaneous sites. There are also building use restrictions associated with the property transfer due to the presence of lead-based paint and asbestos-containing building materials on buildings.

The FOST concludes that corrective action has been completed for all of the carve-outs

proposed for transfer, with the exception of on-going petroleum corrective action at 6 underground storage tanks in Carve-Outs I-B, I-L, and I-M. As stated previously, Carve-Outs I-B, I-L, and I-M are not included in this proposed RCRA Corrective Action Complete Determination because they require additional documentation in order to satisfy the corrective action requirements under RCRA.

For more information about the carve-outs, please see FOST 4 in its entirety.

This DTSC determination shall have no effect upon the MCAS El Toro National Priorities List site designation.

California Environmental Quality Act Notice of Exemption

A draft Notice of Exemption (NOE) has been prepared for this project. DTSC has determined that the proposed RCRA

Corrective Action Complete Determination for Carve-Outs I-E, I-G, I-H, I-I, I-J, I-P, II-G, II-I, II-P, III-D, and the changes to the Former MCAS El Toro boundaries will have no significant environmental effect.

Information Repository




The public is encouraged to review and comment on the proposed Corrective Action Complete Determination for Carve-Outs I-E, I-G, I-H, I-I, I-J, I-P, II-G, II-I, II-P, and III-D at the Former MCAS El Toro. The documents are available for review at Former MCAS El Toro; please call (949) 726-5398 to set up an appointment.

They are also available at the information repository, located at: Heritage Park Regional Library, 14361 Yale Avenue, Irvine, California, (949) 551-7151 (call for current hours).

colgis/el_toro/arcview/projects_june03/newfost2.apr



LEGEND

-  Original MCAS El Toro RCRA Facility Boundary
-  Roads
-  Revised RCRA Facility Boundary

NOTE

Areas shaded have not received RCRA Corrective Action Complete Determination

SOURCES

Final Environmental Baseline Survey, Former Marine Corps Air Station El Toro, California. 2003

DTSC's RCRA Corrective Action Complete Determination Letters to the Navy dated:

- January 12, 2009
- August 28, 2008
- August 29, 2005
- July 23, 2004

Final

January 2009



3000 0 3000 Feet

**DTSC's Revised RCRA Facility Boundary
Former MCAS El Toro
California**

Attachment 4a
Petroleum Products Notification Table

Attachment 4a: Petroleum Products Notification Table

Transfer Parcel	Area Type ID	Petroleum Products*	Dates of Operation	Activities Conducted At Site
Parcel I				
I-B	AST 439	Propane	Unknown-1999	S
I-B	UST 439A	Fuel Oil	1959-1993	S
I-B	UST 439B	Fuel Oil	1959-1994	S
I-B	UST 443	Diesel	1959-1994	S
I-B	AST 651	Propane	Unknown-1999	S
I-B	UST 651-1	Unleaded Gasoline	1971-1999	S
I-B	UST 651-2	Unleaded Gasoline	1971-1999	S
I-B	UST 651-3	Unleaded Gasoline	1971-1999	S
I-B	UST 651-4	Unleaded Gasoline	1971-1999	S
I-B	UST 651-5	Waste Oil	1971-1997	S
I-B	UST 651-6	Motor Oil	1971-1997	S
I-B	UST 651-7	Motor Oil	1971-1997	S
I-B	UST 693A	Diesel	1975-1996	S
I-B	UST 693B	Diesel	1975-1996	S
I-I	UST 46	Diesel	1943-1992	S
I-I	AST 47	Diesel	Unknown-1999	S
I-I	UST 47A	Diesel	1943-1997	S
I-I	UST 47B	Diesel	1943-1997	S
I-L	UST 254	Fuel Oil	1948-1999	S
I-M	UST 65A	Fuel Oil	1943-1997	S
I-P	UST 75A	Diesel	1943-1992	S
I-P	UST 75B	Diesel	1943-1992	S
I-P	UST 75C	Diesel	1943-1992	S
I-P	UST 75D	Heating Oil	1943-1992	S
Parcel II				
II-I	UST 308	Diesel	1944 - 1999	S
II-I	UST 392A	Unleaded Fuel	1944 - 1995	S
II-I	UST 392B	Gasoline	1950 - 1985	S
II-I	UST 392C	Diesel	1950 - 1995	S
II-I	UST 392D	Gasoline	1955 - 1985	S
II-I	UST 392E	Gasoline	1955 - 1995	S
II-I	UST 392F	Gasoline	1987 - 1999	S
II-I	UST 764A	Waste Oil	1950 - 1995	S
II-P	AST 637	Propane	1969 - 1999	S
II-P	UST 637-1	Unleaded Gasoline	1969 - 1999	S
II-P	UST 637-2	Unleaded Gasoline	1969 - 1999	S
II-P	UST 637-3	Unleaded Gasoline	1969 - 1999	S
Parcel III				
III-D	UST 176	Aviation Gas, Wastewater	1943-1995	S
III-D	UST 177	Aviation Gas, Wastewater, Fuel Oil	1943-1995	S

Attachment 4a: Petroleum Products Notification Table

Transfer Parcel	Area Type ID	Petroleum Products*	Dates of Operation	Activities Conducted At Site
III-D	UST 178	Aviation Gas, Wastewater, Fuel Oil	1943-1995	S
III-D	UST 179	Aviation Gas, Wastewater, Fuel Oil	1943-1995	S
III-D	UST 180	Aviation Gas, Wastewater	1943-1995	S
III-D	UST 181	Aviation Gas, Wastewater, Fuel Oil	1943-1995	S
III-D	UST 182	Aviation Gas, Wastewater, Fuel Oil	1943-1995	S
III-D	UST 183	Aviation Gas, Wastewater, Fuel Oil	1943-1995	S
III-D	UST T-5	Waste JP-5	1988-1995	S

Note: * Includes only petroleum products which fall within the scope of the CERCLA petroleum exclusion set forth in CERCLA Section 101(14).

AST = Aboveground Storage Tank

CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act

ID = Identification

JP-5 = Jet Propulsion Fuel, Grade 5

S = Storage of Hazardous/Petroleum Material or Waste

UST = Underground Storage Tank

Source: Earth Tech 2003.

Attachment 4b
Hazardous Substances Notification Table

Attachment 4b: Hazardous Substances Notification Table

Transfer Parcel	Building Number	Area Type ID	Hazardous Substances ^(a)	Reportable Quantity (lb/year) ^(b)	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site
Parcel I								
I-B	Unknown	RAD ADAPT	Potential Radiological Materials	NA	NA	NA	Unknown-1999	ND
I-B	439	SRU 1	Photographic Chemicals	NA	NA	NA	Unknown-1999	ND
I-B	439	PRL 439	Hazardous Wastes/Biohazardous Waste/Photographic Development Chemicals	NA	NA	NA	Unknown-1999	ND
I-B	439	NA	Toluene	0.06	108-88-3	U220	Unknown-1999	Unknown
I-B	439	NA	Toluene Acetone	0.15 0.45	108-88-3 67-64-1	U220 U002	Unknown-1999	Unknown
I-B	439	NA	Isopropyl Alcohol Acetone	4.20 1.40	67-63-0 67-64-1	N.E. U002	Unknown-1999	Unknown
I-B	439	NA	Methanol	1.65	67-56-1	U154	Unknown-1999	Unknown
I-B	439	NA	Formaldehyde Methanol	0.23 0.06	50-00-0 67-56-1	U122 U154	Unknown-1999	Unknown
I-B	443	SRU 2	Photographic Chemicals	NA	NA	NA	Unknown-1999	ND
I-B	651	RFA 164	Solvents, Waste Oil associated with wash rack	NA	NA	NA	Unknown-1996	D
I-B	651	OWS 651-8	Oil/Oily Water	NA	NA	NA	1971-1999	D
I-B	651	UST 651-5	Waste Oil	NA	NA	NA	1971-1997	D
I-B	651	TAA 651A	Substances Associated with less than 90-day accumulation of wastes	NA	NA	NA	Unknown-1999	D

Attachment 4b: Hazardous Substances Notification Table

Transfer Parcel	Building Number	Area Type ID	Hazardous Substances ^(a)	Reportable Quantity (lb/year) ^(b)	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site
I-B	651	NA	P-Xylene M-Xylene Methanol Acetone O-Xylene	58.85 117.70 25.68 149.80 58.85	106-42-3 108-38-3 67-56-1 67-64-1 95-47-6	N.E. N.E. U154 U002 N.E.	Unknown-1999	Unknown
I-B	651	NA	Methyl Isobutyl Ketone Toluene Methanol	36.53 109.60 73.07	108-10-1 108-88-3 67-56-1	U161 U220 U154	Unknown-1999	Unknown
I-B	651	NA	Ethylbenzene P-Xylene M-Xylene Toluene Perchloroethylene 1,1,1-Trichloroethane O-Xylene	5.80 2.90 5.80 5.80 5.80 5.80 2.90	100-41-4 106-42-3 108-38-3 108-88-3 127-18-4 71-55-6 95-47-6	N.E. N.E. N.E. U220 U210 U226	Unknown-1999	Unknown
I-B	651	TAA 651B	Substances Associated with less than 90-day accumulation of wastes	NA	NA	NA	Unknown-1999	D
I-B	651	PRL 651	Substances Associated with Exchange Auto Repair Station	NA	NA	NA	Unknown-1999	ND
I-E	2	TAA 2	Solvents	NA	NA	NA	Unknown-1999	D
I-E	2	NA	Ethylbenzene P-Xylene M-Xylene Toluene Perchloroethylene 1,1,1-Trichloroethane O-Xylene	5.80 2.9 5.8 5.8 5.8 5.8 2.9	100-41-4 106-42-3 108-38-3 108-88-3 127-18-4 71-55-6 95-47-6	N.E. N.E. N.E. U220 U210 U226 N.E.	Unknown-1999	Unknown
I-G	7	TAA 7	Substances Associated with less than 90-day accumulation of wastes	NA	NA	NA	Unknown-1999	S

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Transfer Parcel	Building Number	Area Type ID	Hazardous Substances ^(a)	Reportable Quantity (lb/year) ^(b)	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site
I-G	7	TAA 7B	Substances Associated with less than 90-day accumulation of wastes	NA	NA	NA	Unknown-1999	S
I-H	51	PRL 51	Unknown	NA	NA	NA	Unknown-1999	ND
I-H	51	TAA 51	Substances Associated with Materials Storage	NA	NA	NA	Unknown-1999	D
I-I	46	SRU 3A	Photographic Chemicals	NA	NA	NA	Unknown-1999	D
I-I	46	PRL 46	Photographic Development Chemicals	NA	NA	NA	Unknown-1999	Unknown
I-I	47	PRL 47	Petroleum hydrocarbons, barium, chromium, copper, lead, and other chemicals	NA	NA	NA	Unknown-1999	Unknown
I-J	22	NA	Ethylbenzene P-Xylene M-Xylene Toluene Perchloroethylene 1,1,1-Trichloroethane O-Xylene	2.90 1.45 2.90 2.90 2.90 2.90 1.45	100-41-4 106-42-3 108-38-3 108-88-3 127-18-4 71-55-6 95-47-6	N.E. N.E. N.E. U220 U210 U226 N.E.	Unknown-1999	Unknown
I-J	22	TAA 22	Solvents	NA	NA	NA	Unknown-1999	S
I-J	22	PRL 22	Solvents	N/A	N/A	N/A	Unknown-1999	ND
Parcel II								
II-G	Perimeter Road	APHO 118	Unknown	NA	NA	NA	Unknown-1999	ND
II-I	392	NA	Isocyanates	135.84	71000-82-3	N.E.	Unknown-1999	Unknown

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Transfer Parcel	Building Number	Area Type ID	Hazardous Substances ^(a)	Reportable Quantity (lb/year) ^(b)	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site
II-I	392	TAA 392A	Substances Associated with Materials Storage	NA	NA	NA	Unknown-1999	S
II-I	392	TAA 392B	Substances Associated with Materials Storage	NA	NA	NA	Unknown-1999	S
II-I	764	RFA 213	Solvents, Waste Oils	NA	NA	NA	Unknown-1999	S
II-I	764	UST 764A	Waste Oil	NA	NA	NA	1982-1999	S
II-I	764	OWS 764B	Oil/Oily Water	NA	NA	NA	1982-1999	S
Parcel III								
III-D	26	NA	Toluene Acetone	8.11 lbs 8.84 lbs	108-88-3 67-64-1	U220 U002	Unknown-1999	Unknown
III-D	26	NA	P-Xylene M-Xylene Toluene Ethylene Glycol Monobutyl Ether Acetone O-Xylene	0.29 lbs 0.58 lbs 3.45 lbs 0.05 lbs 5.75 lbs 0.29	106-42-3 108-38-3 108-88-3 111-76-2 67-64-1 95-47-6	N.E. N.E. U220 N.E. U002 N.E.	Unknown-1999	Unknown
III-D	26	NA	Toluene Methyl Ethyl Ketone	0.74 lbs 0.13 lbs	108-88-3 78-93-3	U220 U159	Unknown-1999	Unknown
III-D	26	NA	P-Xylene M-Xylene Propylene Glycol Monomethyl Ether Toluene Acetone Dichloromethane O-Xylene	0.03 lbs 0.05 lbs 0.25 lbs 0.75 lbs 1.75 lbs 2.00 lbs 0.03 lbs	106-42-3 108-38-3 107-98-2 108-88-3 67-64-1 75-09-2 95-47-6	N.E. N.E. N.E. U220 U002 N.E. N.E.	Unknown-1999	Unknown

Notes:

- (a) This table was prepared in accordance with 40 CFR 373 and 40 CFR 302.4. The substances which do not have chemicals-specific break down (and associated annual reportable quantity) are not listed in 40 CFR 302.4, and therefore have no corresponding Chemical Abstracts Services (CAS) number, no regulatory synonyms, no Resource, Conservation and Recovery Act (RCRA) waste numbers, and no reportable quantities
- (b) Reportable Quantity
For Buildings with chemical-specific break down and associated reportable quantity, the information was obtained from the Air Emissions Source Survey, Final Submittal, MCAS El Toro (Radian International 1994). The reportable quantity was assumed to be the estimate of the air emissions value that was calculated based on a quantity used during the year 1994. For non-VOCs, the specific chemicals are listed and the quantity is unknown.

Source: Earth Tech 2003.

APHO	=	Aerial Photograph Anomaly
CAS	=	Chemical Abstract Services
CFR	=	Code of Federal Register
D	=	disposal of hazardous material or waste
ID	=	identification
JP-5	=	jet propulsion fuel, grade 5
lb	=	pound
NA	=	not applicable
N.E.	=	not established
ND	=	operations at site are not determined
OWS	=	oil/water separator
PRL	=	Potential Release Location
RAD ADAPT	=	Radiological Adaptometer
RCRA	=	Resources Conservation and Recovery Act
RFA	=	RCRA Facility Assessment
S	=	storage of hazardous material or waste
SRU	=	silver recovery unit
TAA	=	Temporary Accumulation Area
UST	=	Underground Storage Tank
VOC	=	volatile organic compound